

EXHIBIT 5A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

MICHAEL JENKINS, et al.,

Plaintiffs,

v.

Civil Action No. 3:23-cv-374-DPJ-ASH

RANKIN COUNTY, MISSISSIPPI, et al.,

Defendants.

REMOTE VIDEOTAPED DEPOSITION OF

JEFFREY MIDDLETON

TAKEN ON

FRIDAY, MARCH 14, 2025

10:07 A.M.

FCI MCKEAN

6975 PA-59

LEWIS RUN, PENNSYLVANIA 16738

JEFFREY MIDDLETON
83199

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<p style="text-align: right;">Page 6</p> <p>1 REMOTE VIDEOTAPED DEPOSITION OF</p> <p>2 JEFFREY MIDDLETON</p> <p>3 TAKEN ON</p> <p>4 FRIDAY, MARCH 14, 2025</p> <p>5 10:07 A.M.</p> <p>6</p> <p>7 THE VIDEOGRAPHER: We are on the record.</p> <p>8 The time is 10:07 a.m. The date is March 14, 2025.</p> <p>9 This is the beginning of the deposition of Jeffrey</p> <p>10 Middleton. The case caption is Jenkins vs. Rankin</p> <p>11 County.</p> <p>12 Will counsel please introduce yourselves</p> <p>13 and state whom you represent?</p> <p>14 MR. WALKER: Trent Walker. I represent</p> <p>15 Michael Jenkins and Eddie Parker, the plaintiffs.</p> <p>16 MR. DARE: Jason Dare. I'm here on behalf</p> <p>17 of Rankin County and Sheriff Bryan Bailey.</p> <p>18 MR. LELAND: And Don Leland on behalf of</p> <p>19 Jeffrey Middleton.</p> <p>20 MR. WALKER: All right. And also present</p> <p>21 is my co-counsel Malik Shabazz, also on behalf of</p> <p>22 the plaintiffs.</p> <p>23 THE VIDEOGRAPHER: Our court reporter will</p> <p>24 swear in the witness.</p> <p>25 THE REPORTER: Thank you.</p>	<p style="text-align: right;">Page 8</p> <p>1 MR. WALKER: Okay.</p> <p>2 And Mr. Middleton, that is so that you</p> <p>3 will have the opportunity to read what is</p> <p>4 transcribed here today and attest to the accuracy of</p> <p>5 what's presented in that transcript.</p> <p>6 THE WITNESS: Okay.</p> <p>7 JEFFREY MIDDLETON, having been first duly affirmed</p> <p>8 to tell the truth, was examined, and testified as</p> <p>9 follows:</p> <p>10 EXAMINATION</p> <p>11 BY MR. WALKER:</p> <p>12 Q. All right. So Mr. Middleton, we met and</p> <p>13 briefly conversed. My name is Trent Walker, and as</p> <p>14 I just said, I'm the lawyer who represents Michael</p> <p>15 Jenkins and Eddie Parker in a lawsuit that's been</p> <p>16 filed against Bryan Bailey and Rankin County and the</p> <p>17 individual deputies that were involved in the events</p> <p>18 of January 24, 2023.</p> <p>19 So we're here today to ask you about</p> <p>20 topics that are relevant to that matter. Do you</p> <p>21 understand that?</p> <p>22 A. Yes, sir.</p> <p>23 Q. All right. Are you under the influence of</p> <p>24 any substance that would impair your ability to</p> <p>25 understand the questions that I'm asking or to</p>
<p style="text-align: right;">Page 7</p> <p>1 Mr. Jeffrey Middleton, will you please</p> <p>2 raise your right hand?</p> <p>3 Thank you, sir.</p> <p>4 Do you affirm under the penalty of perjury</p> <p>5 that the testimony you are about to give will be the</p> <p>6 truth, the whole truth, and nothing but the truth?</p> <p>7 THE WITNESS: I do.</p> <p>8 THE REPORTER: Thank you, sir.</p> <p>9 You may now lower your hand.</p> <p>10 Counsel, please proceed. Thank you.</p> <p>11 MR. WALKER: Thank you.</p> <p>12 Let the record reflect we're at the</p> <p>13 deposition of Jeffrey Middleton. This is being</p> <p>14 taken pursuant to notice in accordance with Federal</p> <p>15 Rules of Civil Procedure for all uses as allowed by</p> <p>16 such rules, on March 14, 2025 here at FCI McKean in</p> <p>17 Lewis Run, Pennsylvania. This deposition is being</p> <p>18 taken before a court reporter and notary public.</p> <p>19 All objections except as to form are</p> <p>20 reserved until such time as the deposition testimony</p> <p>21 or any part of it is offered into evidence at trial</p> <p>22 in this matter.</p> <p>23 Don, we are requesting that Mr. Middleton</p> <p>24 read and sign.</p> <p>25 MR. LELAND: I would, too.</p>	<p style="text-align: right;">Page 9</p> <p>1 answer those questions truthfully?</p> <p>2 A. I'm under the influence of nothing.</p> <p>3 Q. Okay. Now, a couple of ground rules, some</p> <p>4 of which have been explained by Ms. Knight, our</p> <p>5 court reporter. Please speak up so she can hear</p> <p>6 you, particularly since we're doing this by Zoom and</p> <p>7 remotely. We want to make sure that we have a clean</p> <p>8 transcript.</p> <p>9 Secondly, as she said, I'm going to do my</p> <p>10 best not to talk over you so I'm going to -- if you</p> <p>11 will let me ask my entire question then I will try</p> <p>12 to be quiet and let you give your entire answer.</p> <p>13 And that will make it that much easier for her to</p> <p>14 transcribe.</p> <p>15 If you don't understand something that I'm</p> <p>16 asking you, please ask me to rephrase the question</p> <p>17 or otherwise let me know you don't know what I'm</p> <p>18 talking about and I'm happy to re-ask my question a</p> <p>19 different way. But if you do answer the question</p> <p>20 then I'm going to assume you understood the question</p> <p>21 before you answered.</p> <p>22 A. Okay.</p> <p>23 Q. All right. If you need a bathroom break</p> <p>24 just let me know. The only caveat being if you</p> <p>25 would answer whatever question is pending and then</p>

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1 ask for a break we will be more than happy to let
2 you do that.
3 I don't intend to be here all day if I can
4 help it, so just, you know, if we can adhere to that
5 then everything should go fairly smoothly.
6 A. Yes, sir.
7 Q. All right. And of course, you've just
8 taken an oath so you're under oath just as if you
9 were in court.
10 A. Okay.
11 Q. All right.
12 And would you state your full name for the
13 record?
14 A. Jeffrey Arwood Middleton.
15 Q. Okay. And would you spell that for -- for
16 the court reporter?
17 A. J-E-F-F-R-E-Y A-R-W-O-O-D M-I-D-D-L-E-T-O-
18 N.
19 Q. Okay. And how old are you, Mr. Middleton?
20 A. Forty-seven.
21 Q. Where were you born?
22 A. Jackson, Mississippi.
23 Q. If this case were to proceed to trial then
24 we would have a jury pool be made up of people who
25 live mostly in Central Mississippi. I believe that

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1 is about 13 counties. Is that right?
2 So for that reason, I'm going to ask you,
3 do you have a lot of relatives in Central
4 Mississippi?
5 A. Well, most all of -- I would most all of
6 my relatives are in like Rankin County.
7 Q. Okay.
8 A. If that consists of Central Mississippi.
9 Q. It does.
10 A. Oh. And I have several in Simpson County.
11 Q. All right. And just generally speaking,
12 what are the last names of those relatives that you
13 have in Rankin and Simpson County?
14
15 A. Middleton and Snell, S-N-E-L-L.
16 Q. Okay. Any other last names of first
17 cousins or --
18 A. That's going to be mostly -- that's going
19 to be mostly it.
20 Q. Okay. Did you attend church when you were
21 a resident of Mississippi?
22 A. Yes
23 Q. Where did you attend?
24 A. Clear Branch, C-L-E-A-R, Branch Baptist
25 Church.

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1 Q. Where is Clear Branch?
2 A. Florence, Mississippi.
3 Q. Okay. And did you participate in any
4 social organizations while you were living in
5 Mississippi in Rankin County?
6 A. As an example, like --
7 Q. Lions Club. Really anything that you
8 spent a lot of time socially with people that was
9 organized -- I'll give you one. Are you a member of
10 Masonic order?
11 A. Yes, sir. I only went to the second
12 degree.
13 Q. Okay.
14 A. And my wife was a -- she didn't -- she was
15 like -- she's like what are you all doing? And I'm
16 like, nothing. Just guys doing a bunch of talking.
17 And then she was like, well, why can't you tell me
18 what you do? And you know, so secrecy or whatever.
19 You know, I don't know if you would call it that but
20 it's -- I didn't do -- I didn't -- I only went those
21 --
22 Q. Two degrees?
23 A. -- two degrees. I've only gone to a lodge
24 thing twice and I --
25 Q. What lodge was it?

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1 A. In Florence. I don't remember the lodge
2 number or anything.
3 Q. Okay. Do you know if it was F and AM or
4 AF and AM?
5 A. I don't. No, sir. I've since been --
6 that's been so many years ago.
7 Q. So no other fraternal organizations?
8 A. No, sir.
9 Q. No car club or motorcycle club of any
10 sort?
11 A. No, sir.
12 Q. All right. Where did you attend high
13 school?
14 A. Florence High School.
15 Q. What year did you finish?
16 A. 1997.
17 Q. And after high school did you receive any
18 higher education?
19 A. No, sir.
20 Q. After high school what was your first job?
21 A. As a mechanic.
22 Q. Okay. And where was that?
23 A. Jackson Powertrain.
24 Q. How long did you work as a mechanic at
25 Jackson Powertrain?

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<p style="text-align: right;">Page 14</p> <p>1 A. Well, full time, I'm not sure but off and 2 on up until the time I got -- when to prison. So 3 I've been, you know, working there part time and 4 then full time my entire, you know, since I've been 5 out of high school and while I was in high school 6 but I didn't work there.</p> <p>7 Q. Okay. When did you enter law enforcement? 8 A. 2003.</p> <p>9 Q. And what agency did you first work for? 10 A. Jackson Police Department.</p> <p>11 Q. How long did you work for the Jackson 12 Police Department? 13 A. Almost three years.</p> <p>14 Q. Until 2006? 15 A. I think so.</p> <p>16 Q. Okay. 17 A. I might not be exact.</p> <p>18 Q. While you were at the Jackson Police 19 Department did you attend or become certified by the 20 Mississippi Law Enforcement Training Academy? 21 A. Jackson Police Department Training Academy 22 is where I received my certification.</p> <p>23 Q. All right. Did you get that in 2003? 24 A. Yes, sir.</p> <p>25 Q. Okay. So you went through the training as</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. Culpable-negligence manslaughter. And you 2 went to trial or entered a plea in that case.</p> <p>3 A. Entered a plea.</p> <p>4 Q. And what was that plea? 5 A. Guilty.</p> <p>6 Q. Okay. And what was your sentence? How 7 was that resolved? 8 A. It was a -- I don't remember what it's 9 called. I can't remember what it was called but 10 they -- they --</p> <p>11 Q. Was it PTI or a non-adjudication? 12 A. Not adjudicated. Yes.</p> <p>13 Q. Okay. Now, a non-adjudication is 14 generally reserved for nonviolent crimes. Correct? 15 A. I'm not sure.</p> <p>16 Q. You're not sure. 17 But you pleaded to culpable-negligence 18 manslaughter and you were not adjudicated on? 19 A. Yes, sir.</p> <p>20 Q. Okay. Who was your attorney? 21 A. Why has that name left me? Mayfield. 22 Tommy Mayfield.</p> <p>23 Q. I know Mayfield. 24 Let me ask you, are you -- were you ever 25 filled in on the details of how you were made</p>
<p style="text-align: right;">Page 15</p> <p>1 part of becoming a member of JPD? 2 A. Yes, sir.</p> <p>3 Q. Did you go to any other formalized 4 training outside of the training that you received 5 at Jackson Police Academy? 6 A. Like? While I was with Jackson?</p> <p>7 Q. Well, yeah. Let's start there. Did you -- 8 -- as, for instance, did you ever go to the FBI 9 Training Academy or take courses at some other law 10 enforcement academy in furtherance of your career in 11 law enforcement? 12 A. No, sir.</p> <p>13 Q. Okay. And what position did you hold 14 within Jackson Police Department? 15 A. Patrol.</p> <p>16 Q. All right. You were a patrolman all three 17 years? 18 A. Yes, sir.</p> <p>19 Q. All right. Why did you leave? 20 A. I was involved in a motor vehicle accident 21 and they terminated my employment.</p> <p>22 Q. So with regard to that termination of 23 employment, you were charged with vehicular 24 homicide? 25 A. Culpable-negligence manslaughter.</p>	<p style="text-align: right;">Page 17</p> <p>1 eligible for a non-adjudication on a culpable- 2 negligence manslaughter plea? 3 A. No, sir.</p> <p>4 Q. Okay. You were just told that this was 5 how the case was going to be resolved? 6 A. Yes, sir.</p> <p>7 Q. When did you join the Rankin County 8 Sheriff's Department? 9 A. 2010.</p> <p>10 Q. And what position were you when you 11 joined? 12 A. A corrections officer.</p> <p>13 Q. How long did you work as a corrections 14 officer? 15 A. I believe it was eight months.</p> <p>16 Q. And what were your duties as a corrections 17 officer? 18 A. Supervising inmates.</p> <p>19 Q. That was it? 20 A. Yes. No supervisor role if that's what 21 you mean. No, sir. I was just --</p> <p>22 Q. And do you know if it was typical for 23 people who joined the Sheriff's Department to start 24 at corrections and move up? 25 A. At the time that I started there it was</p>

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<p style="text-align: right;">Page 18</p> <p>1 very typical.</p> <p>2 Q. Okay. Okay. What other position did you</p> <p>3 hold? Or let me rephrase. After you left</p> <p>4 corrections what position did you move to?</p> <p>5 A. A school resource officer.</p> <p>6 Q. How long did you work as a school resource</p> <p>7 officer?</p> <p>8 A. One school year.</p> <p>9 Q. And from there did you become a patrolman?</p> <p>10 A. Yes, sir.</p> <p>11 Q. All right. And would that have been</p> <p>12 somewhere around 2011 and 2012?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And what were your duties as a patrolman?</p> <p>15 A. To answer calls for service and to patrol</p> <p>16 the county, the area that I was -- I was what they</p> <p>17 would call a South unit. So, and I did North. So</p> <p>18 whenever they split Rankin County into two, a North</p> <p>19 and a South.</p> <p>20 Q. Okay. And the dividing line was where?</p> <p>21 A. It was just always just Highway 80.</p> <p>22 Q. Okay. So North was north of 80 and South</p> <p>23 was south of 80?</p> <p>24 A. Yes, sir.</p> <p>25 Q. And from 2012 up until January of '23 were</p>	<p style="text-align: right;">Page 20</p> <p>1 would be nine or 10 people --</p> <p>2 A. Yeah.</p> <p>3 Q. -- on patrol that were either you or under</p> <p>4 your supervision?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Did anybody co-supervise those patrolmen</p> <p>7 with you?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Who would that have been?</p> <p>10 A. Sergeant.</p> <p>11 Q. Any particular person or just whoever</p> <p>12 happened to be a sergeant?</p> <p>13 A. Well, it would have changed. Like they --</p> <p>14 I had several sergeants that had worked under -- on</p> <p>15 my shift.</p> <p>16 Q. Okay. But did the sergeant report to you</p> <p>17 or are you co-equal?</p> <p>18 A. The way the shift ran was I allowed the</p> <p>19 sergeant to run the shift and if he had any trouble</p> <p>20 he would come to me. Like, hey, we'd like -- so</p> <p>21 we'd co-supervise would be the best way to explain</p> <p>22 that.</p> <p>23 Q. Okay. But even by that explanation the</p> <p>24 sergeant reported to you?</p> <p>25 A. Right. Yes, sir.</p>
<p style="text-align: right;">Page 19</p> <p>1 you always on the South patrol?</p> <p>2 A. January '23? From '23? No, sir.</p> <p>3 Q. Okay. So at some point in time you were</p> <p>4 North patrol?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Okay. How long were you on North patrol?</p> <p>7 A. I'm not exactly sure. I'm not sure.</p> <p>8 Q. When did you become a lieutenant, a patrol</p> <p>9 lieutenant?</p> <p>10 A. Let's see.</p> <p>11 Q. In round numbers. You don't have to be</p> <p>12 exact.</p> <p>13 A. Nineteen. 2018, 2019 maybe.</p> <p>14 Q. Okay.</p> <p>15 A. It could have been as late as 2020.</p> <p>16 Q. All right. And what were your duties as</p> <p>17 the patrol lieutenant?</p> <p>18 A. To supervise the deputies that worked on</p> <p>19 my particular shift.</p> <p>20 Q. And how many deputies would you be</p> <p>21 supervising at any one time?</p> <p>22 A. Eight to nine. They, at one point there</p> <p>23 were eight and then at one point they added one guy</p> <p>24 to each shift to bring it to nine.</p> <p>25 Q. Okay. And so including yourself there</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. You didn't report to the sergeant?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. And that eight or nine people,</p> <p>4 would that be the north and the south or just the</p> <p>5 south end?</p> <p>6 A. North and south.</p> <p>7 Q. So at any given time on your shift there</p> <p>8 would be 10 people out patrolling the county you</p> <p>9 think?</p> <p>10 A. Nine counting me.</p> <p>11 Q. Nine including you?</p> <p>12 A. Yes, sir. And then before the man got</p> <p>13 added it would be eight including me.</p> <p>14 Q. Okay. So did you ever hold any other</p> <p>15 positions within the department?</p> <p>16 A. I don't remember exactly when but I was a</p> <p>17 sergeant before I was a lieutenant.</p> <p>18 Q. Okay. And who was the lieutenant that you</p> <p>19 reported to?</p> <p>20 A. Three different ones. Craig Williams,</p> <p>21 Billy Luke, Tim Glasbar, and Paul Mullins.</p> <p>22 Q. That was Paul Mullins, the last person you</p> <p>23 reported to before you became a lieutenant?</p> <p>24 A. Billy Luke.</p> <p>25 Q. Billy Luke. Okay. And what were the</p>

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<p style="text-align: right;">Page 22</p> <p>1 circumstances of your becoming, moving from sergeant 2 to lieutenant? 3 A. One of our lieutenants retired. I'm 4 trying to think of his name. But a lieutenant 5 retired and it opened up a lieutenant spot and I 6 interviewed for it and got it. 7 Q. Okay. And that was when you moved from 8 sergeant to lieutenant? 9 A. Yes, sir. 10 Q. All right. So were you ever on the 11 narcotics unit? 12 A. No, sir. 13 Q. All right. Were you ever on the SRT team? 14 A. Yes, sir. 15 Q. All right. When did you join the SRT 16 team? 17 A. Around about 2013, 2014. 18 Q. All right. And for the purposes of the 19 deposition would you explain what is the SRT team? 20 A. The SRT is special response team. And 21 their purpose is to if there's barricaded subjects, 22 high-risk warrants, which I can only recall one or 23 two times doing that, and assist other cities or 24 counties with, you know, whatever we'd get would be 25 abnormal scope of duties for regular patrolmen.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Right. And then again, this, it's not a 2 trick question and, you know, I'm not expecting you 3 necessarily to be exact but he did fall under you 4 for some point in time, maybe a couple of years 5 before he moved to investigations. Is that your 6 understanding? 7 A. That's correct. Yes, sir. 8 Q. Okay. Did you also supervise Hunter 9 Elward? 10 A. Yes, sir. 11 Q. All right. And he was a patrolman -- was 12 he a patrolman in January of 2023? 13 A. Yes, sir. 14 Q. All right. What about Mr. Opdyke? 15 A. Yes, sir. The same would apply to him. 16 Q. All right. And so Mr. Elward, Mr. Opdyke, 17 yourself. And at that particular point in time, Mr. 18 Dedmon had moved to investigations where he worked 19 at that time under Brett McAlpin? 20 A. In January 2023? Yes, sir. 21 Q. All right. So to the best of your 22 recollection, can you name the eight or nine 23 deputies that you would have been supervising in 24 January of 2023? 25 A. Daniel Opdyke, Hunter Elward, Jeremiah</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. Okay. Would it be akin to a SWAT team? 2 A. Yes, sir. 3 Q. All right. And how did you become a 4 member of the SRT team? 5 A. Just by a memo, you know, giving my desire 6 to become a part of the team and then tryouts. 7 Q. Okay. And what did the tryout consist of? 8 A. Just a lot of physical, running, pushups, 9 you know, the PTIS would be the easiest way to say, 10 shooting skills, and then there would be an 11 interview afterwards for, you know, just questioning 12 why you wanted to be a part of the team and things 13 such as that. 14 Q. Okay. So you were a sergeant or you were 15 at least a sergeant in 2017. Would that be correct? 16 A. That should be close. Yes, sir. 17 Q. Okay. And you supervised Christian Dedmon 18 for the amount of time that he was a patrolman. 19 Would that also be correct? 20 A. But not as a sergeant, but yes, sir. 21 Q. When you supervised him you were a 22 lieutenant? 23 A. I believe that's correct. I think when he 24 first came I may have still been a sergeant and 25 then, you know, in that time --</p>	<p style="text-align: right;">Page 25</p> <p>1 Jordan was the sergeant and oh, man, I'm not sure 2 exactly when -- but I mean, let me go and get the 3 others first. Natsy Molingo (phonetic), Napoleon. 4 We called him Natsy but it's Napoleon Molingo. 5 Q. Okay. 6 A. Zachary Cotton. I think Zak was still on. 7 How many is that? 8 Q. That's five. Six including you. 9 A. And I can't remember. I'm sorry. 10 Q. That's okay. But there are two to three 11 other people? 12 A. Yes, sir. 13 Q. Okay. 14 A. And Luke Stickman, I'm not sure when he 15 was in. I think he was already gone at that time. 16 Q. But he was a patrolman under you for -- 17 A. I think he had made sergeant and he was 18 not under me at that time. I'm pretty sure. 19 Q. He became a sergeant and worked -- was he 20 still working patrol or did he go onto 21 investigations? 22 A. No. He was still working patrol but he 23 was on another shift. 24 Q. Okay. 25 A. So I don't -- I don't think at this time</p>

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<p style="text-align: right;">Page 26</p> <p>1 he was on my shift.</p> <p>2 Q. So there still may have been two or three</p> <p>3 other people you can't remember.</p> <p>4 Did you have a relationship with Brett</p> <p>5 McAlpin?</p> <p>6 A. Other than work?</p> <p>7 Q. Yes.</p> <p>8 A. Early on but it -- after, I'm not sure.</p> <p>9 It just kind of petered out. There was nothing --</p> <p>10 if that makes sense, like early on a little bit,</p> <p>11 occasionally.</p> <p>12 Q. You all socialized. And when you say a</p> <p>13 little bit, occasionally, you socialized outside of</p> <p>14 work?</p> <p>15 A. Occasionally. And -- and then it -- I</p> <p>16 would say within, well, prior to January of '23, I</p> <p>17 would back up three years and we didn't even</p> <p>18 socialize outside of work.</p> <p>19 Q. And was there anything in particular that</p> <p>20 brought that on?</p> <p>21 A. No, sir. Just business of him, you know,</p> <p>22 moving to his position and just me like, I don't</p> <p>23 know, just like nothing in particular. No. I had</p> <p>24 kids and was more about my family, I guess, just --</p> <p>25 Q. His position was chief investigator?</p>	<p style="text-align: right;">Page 28</p> <p>1 A. Carlos Tanner was my attorney throughout</p> <p>2 the criminal case. It was before Mr. Tanner was</p> <p>3 retained by me. The other one was, before Mr.</p> <p>4 Tanner, he was retained by the PBA.</p> <p>5 Q. Okay. What's the PBA?</p> <p>6 A. Police Benevolent Association.</p> <p>7 Q. Okay. Do you remember when it was that</p> <p>8 you found out?</p> <p>9 A. No, sir.</p> <p>10 Q. Okay. After January 24th, did your duties</p> <p>11 within the department change?</p> <p>12 A. After --</p> <p>13 Q. Like the --</p> <p>14 A. -- January 23, 2023? January 24, 2023?</p> <p>15 Q. No. The night -- the night of the</p> <p>16 incident on Conerly Road.</p> <p>17 A. Yes, sir.</p> <p>18 Q. All right. Did your -- did your duties</p> <p>19 change after that night?</p> <p>20 A. No, sir.</p> <p>21 Q. Okay. So you continued as a patrolman?</p> <p>22 A. Yes, sir.</p> <p>23 Q. You continued as a lieutenant?</p> <p>24 A. Yes, sir.</p> <p>25 Q. And you were working as a patrol</p>
<p style="text-align: right;">Page 27</p> <p>1 A. Right.</p> <p>2 Q. And he was busy, you were busy, so there</p> <p>3 wasn't a lot of time for outside socializing?</p> <p>4 A. Right. Yes, sir.</p> <p>5 Q. And what about Mr. Elward and Mr. Opdyke?</p> <p>6 Did you socialize with either the two of them</p> <p>7 outside of work?</p> <p>8 A. Opdyke, no. Elward, occasionally. And</p> <p>9 Dedmon, very, very rarely. Like I could probably</p> <p>10 say two or three times maybe.</p> <p>11 Q. And when we use the term "socialize," what</p> <p>12 kind of get-togethers would you all have?</p> <p>13 A. Just a, like one of the, like a kid's</p> <p>14 birthday party. And maybe like a crawfish boil but</p> <p>15 that would be about it.</p> <p>16 Q. Okay. Do you know what date you were</p> <p>17 terminated from the Sheriff's Department?</p> <p>18 A. I can't remember those.</p> <p>19 Q. All right. How did you learn that you</p> <p>20 were terminated from the Sheriff's Department?</p> <p>21 A. My attorney.</p> <p>22 Q. And at that time who was your attorney?</p> <p>23 A. He was PBA appointed. I can't remember</p> <p>24 his name.</p> <p>25 Q. Would that be Mr. Tanner?</p>	<p style="text-align: right;">Page 29</p> <p>1 lieutenant the day you found out that you were</p> <p>2 terminated?</p> <p>3 A. Yes, sir.</p> <p>4 Q. So --</p> <p>5 A. And --</p> <p>6 Q. Go ahead.</p> <p>7 A. I'm trying to remember exactly the dates</p> <p>8 but maybe a few days before that, maybe a week or</p> <p>9 something before it, I think I did get put on</p> <p>10 administrative leave with pay and they asked me to</p> <p>11 turn my truck and equipment in. So I'm not sure</p> <p>12 exactly what the gap there was between when they</p> <p>13 asked me to do that and when my attorney called me</p> <p>14 and told me that they were terminating me.</p> <p>15 Q. It probably wasn't more than a week.</p> <p>16 Would that be fair?</p> <p>17 A. I would just want to put it a little bit</p> <p>18 bigger and say two weeks.</p> <p>19 Q. Okay. But all the way up until two weeks</p> <p>20 before you were terminated, you were working in your</p> <p>21 usual duties and then you were put on administrative</p> <p>22 leave?</p> <p>23 A. Yes, sir.</p> <p>24 Q. All right. Now, before that two weeks did</p> <p>25 you know that you or anybody else was under</p>

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<p style="text-align: right;">Page 30</p> <p>1 investigation based on this incident at Conerly 2 Road? 3 A. Yes, sir. 4 Q. Okay. When did you find out you were 5 under investigation? 6 A. I'm not 100 percent but maybe in April. 7 Q. Okay. About three months later? 8 A. Maybe. Yes, sir. 9 Q. And up until then you had no idea that 10 anything was out of the ordinary? 11 A. No, sir. 12 Q. Had you been asked to give a statement to 13 the Mississippi Bureau of Investigatives about what 14 -- Mississippi Bureau of Investigations about what 15 occurred at Conerly Road? 16 A. Yes, sir. 17 Q. Prior to April? 18 A. Yes, sir. 19 Q. And what did you tell them? 20 A. They -- that night just to -- you're 21 talking about just like summarize the -- 22 Q. Yes. 23 A. Yes. That I rode over there and just to 24 see what was going on in that area because the house 25 was close to Brett McAlpin's house.</p>	<p style="text-align: right;">Page 32</p> <p>1 we -- he walked out of the hall into the bedroom and 2 I walked out of the bathroom into the bedroom. And 3 then we started discussing the murder that had 4 happened. And lots, a good bit of time had lapsed 5 between us doing that but that's where myself and 6 McAlpin were at when we heard the gunshot. 7 Q. Would that be the gunshot that Dedmon 8 fired or the gunshot of Elward shooting Jenkins in 9 the mouth? 10 A. They were pretty close together I think. 11 I didn't get a distinct -- when I heard that I don't 12 recall getting that distinct two different shots. 13 It wasn't like a boom, boom or anything like that. 14 They were close together. I would call like say, 15 oh, man, that was two distinct gunshots. I remember 16 a gunshot and now you had asked me -- so now let me 17 back up. What I told MBI was that myself and Brett 18 discussed the murder that had happened and that I 19 was leaving. I was in my truck leaving when I heard 20 them call for medical so therefore, I returned. I 21 never got out of the driveway I told them. So I 22 pulled back forward and then to see, you know, why 23 they was calling for medical. And that's when I was 24 made aware of the shooting. 25 Q. Okay.</p>
<p style="text-align: right;">Page 31</p> <p>1 Q. Okay. 2 A. And I just found it odd that somebody was 3 supposedly selling drugs, like I would almost say 4 the neighborhood, but it's out in the country so 5 it's really not neighborhoods, but that close to our 6 chief investigator's house. So I rode over just out 7 of curiosity. And then myself and Brett McAlpin 8 were in the back of the room and because -- let me 9 back up just a touch. Whenever I got there, Opdyke, 10 Elward, Dedmon, and Hartfield had already went to 11 the house and went inside the house. 12 Q. This is what you told MBI or this is what 13 happened? 14 A. This is what I told MBI. 15 Q. Okay. 16 A. And this is what happened. 17 Q. Continue. 18 A. And then I went into the house. And then 19 they were -- one guy was handcuffed in the living 20 room. I walked past him. One guy was handcuffed in 21 the hallway. I walked past him. And myself and 22 Opdyke continued down the hallway to make sure 23 everybody was in the house. And I was in the master 24 bedroom, the back bedroom coming out of the master 25 bathroom when McAlpin walked into the bedroom. So</p>	<p style="text-align: right;">Page 33</p> <p>1 A. So that's what I told MBI. 2 Q. All right. Going back to that in a little 3 bit. 4 So just based on what we've been able to 5 put together, Christian Dedmon sent out a group text 6 and asked are you all available for a mission. Do 7 you recall that? 8 A. I was not added to that group until later. 9 Q. How much later? 10 A. I was -- had pulled up in my driveway at 11 my home. I had always -- I had been told, you know, 12 by administration that -- let me back up a little 13 bit so I can explain this how it worked. 14 So I was told by administration to allow 15 my guys if they were not busy to help Dedmon with 16 that because -- with his narcotic duties because it 17 was just him. And so it was very common knowledge 18 for all four shifts if he was doing some kind of 19 narcotics investigation that he could use deputies 20 off the shift that were working. 21 Q. Okay. 22 A. And so that night, Elward takes me and 23 said, hey, we're helping 12, which is Rankin 12, 24 that's Dedmon's number, call sign, with a mission at 25 135 Conerly Road. And I'm not 100 percent if I did</p>

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<p style="text-align: right;">Page 34</p> <p>1 a thumbs up or okay but that was the gist of that 2 text. My family was not home. I usually had a 3 habit of going home, you know, seeing my kids to bed 4 and things such as that. My family wasn't at home. 5 They were at my in-laws. So I decided at that point 6 that I would leave and drive over there. And I was 7 going to stop by McAlpin's house and ask him, you 8 know, like, hey, what's going on with this house 9 that Dedmon and them are going to? But he was not 10 home. So I moved around and went by the address. 11 Q. Okay. 12 A. To see if they were there because at this 13 point the only thing I knew about it was what Elward 14 had sent me. 15 Q. Okay. 16 A. And -- 17 Q. Which was one text? 18 A. Right. And then I went by the house and 19 nobody was there. 20 Q. At 135 Conerly Road? 21 A. Yes, sir. And then I got the message from 22 Dedmon saying, hey, LT, why don't you turn your shit 23 off and come over here? And I never questioned what 24 he meant by that and I still to this day don't know 25 what he meant by that. But my response to him was</p>	<p style="text-align: right;">Page 36</p> <p>1 A. I have no clue. 2 Q. Okay. When he said turn your shit off and 3 come with us, what did you understand that to mean? 4 A. The only thing that I could think of -- 5 because when he said that, that's why I went him one 6 that said, well, I'm already in the area. The only 7 thing that I could think of that he would mean by 8 that would be my radio because I couldn't think of 9 anything else that he was saying turn off. 10 Q. Why would you need to be radio silent for 11 this? 12 A. I have no clue. I do not know why he 13 would do that. I cannot answer for him. 14 Q. Okay. But certainly as the shift 15 lieutenant you couldn't think of a reason to be 16 radio silent? 17 A. Absolutely not. 18 Q. All right. But then, were you also 19 equipped with bodycam at the time? 20 A. Yes, sir. 21 Q. All right. At what point in time did you 22 turn your bodycam off? 23 A. I never had it on. 24 Q. You never had it on. Why not? 25 A. Because at that point in time, anytime you</p>
<p style="text-align: right;">Page 35</p> <p>1 -- is I'm already in the area. And that's when I 2 was added to the message. 3 Q. All right. So at the point in time where 4 you were then added to the message, what messages 5 transpired or what did you become privy to? 6 A. Just the, hey, I'm on the way. Dedmon 7 saying, hey, I'm on the way. And I don't remember 8 who responded. Whoever's waiting at this fire 9 department. And I don't remember who responded to 10 that and said that. And then they sent one that 11 said I'm almost there. And I can honestly say that 12 I was not reading these texts. I just -- now I'm 13 going off of what I've seen in the criminal case. 14 But my phone was in the truck while we was inside 15 the fire department. I went in there to use the 16 bathroom, whatever, and whatever. I come back out. 17 Dedmon had come by. So -- 18 Q. Come by the fire department? 19 A. Right. So we ended up -- 20 Q. So then what happens? 21 A. We left the fire department at that time. 22 But I later seen on my phone that he had said 23 something to me about some cameras and to work easy 24 or something. 25 Q. Do you know what work easy meant?</p>	<p style="text-align: right;">Page 37</p> <p>1 do narcotics investigations, we did not wear body 2 cameras. 3 Q. Okay. 4 A. It was not -- 5 Q. These are for the entire investigation or 6 if you were working with a confidential informant? 7 A. Both. 8 Q. Explain. 9 A. As anytime that we -- they work with 10 Dedmon on a narcotics investigation where there was 11 a -- would be a confidential informant or possibly 12 could be a possible confidential informant, they did 13 not wear body cameras. 14 Q. So if they were working with Dedmon, and 15 I'm going to presume the same thing with the extent 16 to Mr. McAlpin. Yes? 17 A. Like McAlpin did this time. But back with 18 McAlpin, we didn't have body cameras. My team 19 wasn't narcotics. But as the chief investigator, he 20 did not -- he just came to see me after the fact if 21 that makes sense, like -- 22 Q. No, no, no, no. So I think what you're 23 getting to is that McAlpin would not have had a 24 bodycam because he would come to the scene after the 25 detention had occurred.</p>

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<p style="text-align: right;">Page 38</p> <p>1 A. Yes, sir.</p> <p>2 Q. Okay. But my question is, if your patrol</p> <p>3 deputies were told not to wear or not to turn their</p> <p>4 bodycams on with Dedmon because of the potential</p> <p>5 that they would run across or have contact with a</p> <p>6 confidential informant that they were not to wear</p> <p>7 their bodycams. Is my understanding correct?</p> <p>8 A. Yes, sir.</p> <p>9 Q. All right. So anytime Dedmon asked your</p> <p>10 deputies to participate it was standard operating</p> <p>11 procedure that they would turn their bodycams off?</p> <p>12 MR. LELAND: Object to form.</p> <p>13 BY MR. WALKER:</p> <p>14 Q. Do you understand my question?</p> <p>15 A. I believe I do. So you're asking that</p> <p>16 anytime that any deputies work with Dedmon that they</p> <p>17 were to turn their body cameras off or not even have</p> <p>18 them on, period?</p> <p>19 Q. Correct. That's my question.</p> <p>20 A. That was -- I just wanted to make sure I</p> <p>21 understood it correct. But that was my</p> <p>22 understanding up until the day of this happening.</p> <p>23 Q. And your understanding is that was because</p> <p>24 of the potential to interact with confidential</p> <p>25 informants?</p>	<p style="text-align: right;">Page 40</p> <p>1 whatever.</p> <p>2 Q. Mm-hmm.</p> <p>3 A. But then he's going to either just take</p> <p>4 that person to jail after, you know, if he finds a</p> <p>5 reason, or he may call Dedmon. Like, hey, I've got</p> <p>6 this person. They say that they can buy some drugs.</p> <p>7 Narcotics. And --</p> <p>8 Q. So the patrolmen would --</p> <p>9 MR. LELAND: He wasn't done there.</p> <p>10 BY MR. WALKER:</p> <p>11 Q. I'm sorry. So finish.</p> <p>12 A. So then they were -- the deputies would</p> <p>13 have to have their cameras on at that point.</p> <p>14 Q. Yes.</p> <p>15 A. Up until the point where they call Dedmon</p> <p>16 and said, hey, this guy wants to buy some narcotics.</p> <p>17 He wants to cut himself out. So once that -- Dedmon</p> <p>18 got involved so now we've got a CI. Now they would</p> <p>19 turn their bodycams off.</p> <p>20 Q. All right. So if you had a situation</p> <p>21 where you -- you know what a knock and talk is?</p> <p>22 A. Yes, sir.</p> <p>23 Q. All right. So if you have a situation</p> <p>24 where you have a knock and talk then are those body</p> <p>25 cameras supposed to be on or off?</p>
<p style="text-align: right;">Page 39</p> <p>1 A. Yes, sir.</p> <p>2 Q. But the -- would you agree with me that</p> <p>3 all drug interactions did not involve confidential</p> <p>4 informants?</p> <p>5 A. The potential to me --</p> <p>6 Q. No. Just --</p> <p>7 A. Okay. Okay.</p> <p>8 Q. All the directions don't, you know --</p> <p>9 A. Yes, sir. I would agree with you. Not</p> <p>10 all drug interactions have a confidential informant.</p> <p>11 Q. Yeah. You know, you pull a vehicle over.</p> <p>12 The vehicle smells like weed.</p> <p>13 A. Right.</p> <p>14 Q. You search somebody. You either do or</p> <p>15 don't find the marijuana.</p> <p>16 A. Right.</p> <p>17 Q. Or what have you. That's not a</p> <p>18 confidential informant situation.</p> <p>19 A. And to my knowledge they like -- they</p> <p>20 would have their cameras on at that time.</p> <p>21 Q. Okay.</p> <p>22 A. And only after --</p> <p>23 Q. Right. But and -- I'm sorry. Finish what</p> <p>24 you were about to say.</p> <p>25 A. A deputy stops a car, smells marijuana or</p>	<p style="text-align: right;">Page 41</p> <p>1 A. I'm not -- I cannot say that specific --</p> <p>2 that specific situation on a knock and talk. That</p> <p>3 was -- I did not do the narcotics so I would -- I'm</p> <p>4 not sure how to -- I can't give that answer.</p> <p>5 Q. Okay. Do you know if Sheriff Bailey had</p> <p>6 an expectation that you all would have had your body</p> <p>7 cameras on?</p> <p>8 MR. LELAND: When?</p> <p>9 THE WITNESS: When they went to do the</p> <p>10 knock and talk?</p> <p>11 BY MR. WALKER:</p> <p>12 Q. Yes.</p> <p>13 A. I don't know if he would or not but it was</p> <p>14 my understanding that they have done the same thing</p> <p>15 before without body cameras. And --</p> <p>16 Q. At what point in time?</p> <p>17 A. Just whenever they go help Dedmon with a</p> <p>18 narcotics deal they had just told me that anytime</p> <p>19 they would do anything narcotics -- I did not</p> <p>20 witness this. This is what I was just told; that</p> <p>21 anytime they do the narcotics mission or whatever</p> <p>22 you want to call it, investigation with Dedmon, they</p> <p>23 were not to wear their body cameras.</p> <p>24 Q. So just to return briefly to the group</p> <p>25 text, did you ever see the baby crying emoji or when</p>

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<p style="text-align: right;">Page 42</p> <p>1 there was talk about working easy?</p> <p>2 A. Before I got to the house? No, sir. That</p> <p>3 was later in the investigation.</p> <p>4 Q. But you did see -- you did see that those</p> <p>5 emojis were present?</p> <p>6 A. Before we went to the house --</p> <p>7 Q. No. When you saw your phone.</p> <p>8 A. After everything had happened. And after</p> <p>9 -- I don't -- when I first recall seeing those baby</p> <p>10 cries was on the criminal paperwork that they had</p> <p>11 given me and they were showing me the text messages.</p> <p>12 Like I said, that -- whenever he was sending all of</p> <p>13 those messages or they was going back and forth, I</p> <p>14 never recall reading those.</p> <p>15 Q. Okay.</p> <p>16 A. And then later on whenever I got to my</p> <p>17 phone, I still don't recall just going back and</p> <p>18 reading because now this is everything that has</p> <p>19 transpired. I don't recall going back and reading</p> <p>20 each message.</p> <p>21 Q. So when Dedmon sends out a text and says</p> <p>22 that they're going to "work easy," and Elward sends</p> <p>23 a baby crying emoji, would that suggest to you that</p> <p>24 Elward had previously been involved in violent</p> <p>25 activity with Dedmon?</p>	<p style="text-align: right;">Page 44</p> <p>1 first. Only that Hunter sent. And I was only left</p> <p>2 to assume that he was talking about an investigation</p> <p>3 with Dedmon.</p> <p>4 Q. So you thought that a mission was an</p> <p>5 investigation?</p> <p>6 A. Correct.</p> <p>7 Q. All right. And you didn't think that</p> <p>8 there was anything illegal about the mission that</p> <p>9 they were going on?</p> <p>10 A. No, sir.</p> <p>11 Q. And what you're telling me is that your</p> <p>12 understanding was that this was going to be a</p> <p>13 standard drug investigation?</p> <p>14 A. Yes, sir.</p> <p>15 Q. And what did you understand that your role</p> <p>16 was supposed to be?</p> <p>17 A. Like from Dedmon, Dedmon is the same rank</p> <p>18 as me. He's an investigator or a lieutenant. The</p> <p>19 Sheriff's Office looks to those as same rank. So it</p> <p>20 was not for me to come over and supervise or</p> <p>21 anything such as that. I guess he just wanted me to</p> <p>22 come over. I don't have a role because he would</p> <p>23 know that I never, hardly ever went on any</p> <p>24 investigation or mission with them -- with him.</p> <p>25 Q. Was there a reason you didn't?</p>
<p style="text-align: right;">Page 43</p> <p>1 A. I would not know that or read into that.</p> <p>2 No, sir.</p> <p>3 Q. Okay.</p> <p>4 A. I just -- the last message I remember</p> <p>5 reading, and I will get to your question, too, is</p> <p>6 whenever he said, "Hey, LT, why don't you come over</p> <p>7 here with us?" And I said, "I'm already in the</p> <p>8 area." And that's the last message that I remember</p> <p>9 reading through that. All right. And then the</p> <p>10 other stuff later that I seen with the crying emoji</p> <p>11 and stuff like that, I do not know what he, Hunter</p> <p>12 Elward or Opdyke meant by the emojis that they sent.</p> <p>13 Q. Had you ever heard the use of the term</p> <p>14 "mission" before within your employment at the</p> <p>15 Sheriff's Department?</p> <p>16 A. Possibly. I could not recall an exact --</p> <p>17 I got -- I don't think that I could accurately say</p> <p>18 that no, I've never heard that because I'm sure it</p> <p>19 happens but, you know, I couldn't say when or where</p> <p>20 or anything.</p> <p>21 Q. How did you become familiar with that term</p> <p>22 as it was used by Dedmon that day?</p> <p>23 A. How or when? How, it was just by that</p> <p>24 text that Hunter had sent me. Not that -- because I</p> <p>25 was not part of the text that Dedmon sent to them</p>	<p style="text-align: right;">Page 45</p> <p>1 A. I just -- he was -- I don't know, let me</p> <p>2 see the words to explain it. Like hyperactive. I</p> <p>3 don't know if that would be right.</p> <p>4 Q. Well, due to the language you mean by</p> <p>5 hyperactive?</p> <p>6 A. Well, like one time that I did go with him</p> <p>7 he was talking to this female and he was like</p> <p>8 jumping up and down, like screaming at her. And I</p> <p>9 was just like shaking my head and like that's the</p> <p>10 kind of thing. And I could not tell you an exact or</p> <p>11 what it was but I just heard other people say that</p> <p>12 he just gets out of hand. And that's what I mean</p> <p>13 like -- that's what I assume like out of hand with</p> <p>14 me because when I'm talking to myself, like hey, and</p> <p>15 I seen him like, you know, that just didn't seem</p> <p>16 professional to me. So I just separated myself from</p> <p>17 that.</p> <p>18 Q. And you assume that his getting out of</p> <p>19 hand did not extend any further than yelling and</p> <p>20 screaming at people?</p> <p>21 A. Right. Yes, sir.</p> <p>22 Q. Which you found to be unnecessary?</p> <p>23 A. Right. Yes, sir.</p> <p>24 Q. Who were the other people you heard that</p> <p>25 from?</p>

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<p style="text-align: right;">Page 46</p> <p>1 A. I could not -- I don't know.</p> <p>2 Q. Had you ever heard from these other people</p> <p>3 that Dedmon would be violent with people that he had</p> <p>4 detained or arrested?</p> <p>5 A. I would say yes.</p> <p>6 Q. Had you heard from other people that</p> <p>7 Dedmon would be violent with people he had detained</p> <p>8 or arrested on multiple occasions?</p> <p>9 A. I would say yes. I mean, I don't know,</p> <p>10 more than one is multiple. So yes.</p> <p>11 Q. Did you ever hear from anyone that Brett</p> <p>12 McAlpin was violent with people that were arrested</p> <p>13 or detained?</p> <p>14 A. No, sir.</p> <p>15 Q. You never heard that?</p> <p>16 A. No.</p> <p>17 Q. Did you ever hear of any issues with</p> <p>18 Opdyke being violent with people that had been</p> <p>19 arrested or detained?</p> <p>20 A. No.</p> <p>21 Q. Did you ever hear of any issues with</p> <p>22 Elward being violent with people that had been</p> <p>23 arrested or detained?</p> <p>24 A. No.</p> <p>25 Q. Did you ever hear of any issues with Luke</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. You never knew that there was a</p> <p>2 publication that involved Stickman and some other</p> <p>3 deputies?</p> <p>4 A. Absolutely not. No, sir.</p> <p>5 Q. You never heard of that?</p> <p>6 A. No, sir.</p> <p>7 Q. This is your first time hearing about it</p> <p>8 today?</p> <p>9 A. That's my first time hearing about this</p> <p>10 today. That somebody got points for killing</p> <p>11 somebody?</p> <p>12 Q. Or they were joking about getting points</p> <p>13 for killing people.</p> <p>14 A. Not that I -- no, I don't remember. If</p> <p>15 I've read that -- I do not No, sir. That's --</p> <p>16 that's a firm -- I cannot recall that. I mean,</p> <p>17 again, if it's -- if it was there I don't remember</p> <p>18 reading that. I mean, in some of those group chats,</p> <p>19 some of those guys, I'm an older guy so I'm a lot</p> <p>20 slower, they, sometimes when I check my phone there</p> <p>21 may be 20 or 30 messages from that group chat</p> <p>22 because they go back and forth. Like and each, it</p> <p>23 might say, hey. You know, it says, yo, what's up?</p> <p>24 So that's two messages. Right? So there may be 20</p> <p>25 or 30 messages. So I just skip all of that stuff</p>
<p style="text-align: right;">Page 47</p> <p>1 Stickman being violent with people that had been</p> <p>2 arrested or detained?</p> <p>3 A. No.</p> <p>4 Q. Were you familiar or did you at some point</p> <p>5 become familiar with the publication regarding</p> <p>6 WhatsApp that involved several deputies within the</p> <p>7 department? First of all, do you know what WhatsApp</p> <p>8 is?</p> <p>9 A. Right.</p> <p>10 Q. Okay. The messaging app?</p> <p>11 A. Right.</p> <p>12 Q. All right. Had you ever heard of the</p> <p>13 WhatsApp going on with the deputies between the</p> <p>14 departments or within the department?</p> <p>15 A. There were several groups and like I think</p> <p>16 that's what my shift was WhatsApp. There's another</p> <p>17 platform as well. I can't remember exactly which</p> <p>18 one. But as far as anything other than that the SRT</p> <p>19 team met up group and but other than that --</p> <p>20 Q. Okay. Well, are you familiar with</p> <p>21 WhatsApp messages talking about points for killing</p> <p>22 people?</p> <p>23 A. No, sir.</p> <p>24 Q. Points awarded for killing people?</p> <p>25 A. No, sir.</p>	<p style="text-align: right;">Page 49</p> <p>1 and get, you know, start at the bottom. And I just</p> <p>2 -- I do not ever recall reading nobody any kind of</p> <p>3 points. I do not recall that.</p> <p>4 MR. WALKER: Okay. Let's take a break.</p> <p>5 Just briefly.</p> <p>6 We'll go off the record, Madam Court</p> <p>7 Reporter.</p> <p>8 THE REPORTER: Thank you.</p> <p>9 Okay. We are off record. The time is now</p> <p>10 11:09 a.m. Thank you.</p> <p>11 (WHEREUPON, a recess was taken.)</p> <p>12 THE VIDEOGRAPHER: We are on the record.</p> <p>13 The time is 11:19 a.m.</p> <p>14 You may now proceed.</p> <p>15 BY MR. WALKER:</p> <p>16 Q. Okay. So Mr. Middleton, I believe that</p> <p>17 before we got off you said that you knew that -- I</p> <p>18 believe the words you used were that Mr. Dedmon had</p> <p>19 a reputation for getting out of hand. And for that</p> <p>20 reason you limited your interaction with Mr. Dedmon</p> <p>21 at least on a working level.</p> <p>22 Would that be right?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Yes?</p> <p>25 A. Yes.</p>

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50 to 53

<p style="text-align: right;">Page 50</p> <p>1 Q. But that you had no idea that Brett 2 McAlpin had a reputation for any sort of violence. 3 A. Not -- not that I -- no, sir. That's been 4 so long ago that he was working narcotics that I 5 don't remember any reputation that he may have had. 6 Q. And you -- he was a coworker of yours from 7 2010 up until -- 8 A. Until we were terminated. 9 Q. Until you were terminated. And all that 10 time you never heard anything about McAlpin being 11 violent? 12 A. I can't say that I'd say no to that. I 13 mean, I possibly could have heard that but I do not 14 recall like him having a reputation of being 15 violent. You know, anywhere in that time from 2010 16 to 2023, I may have heard something, you know, but I 17 cannot give any specifics or who had said it or 18 anything like that. I guess what I would say is I 19 don't want to say like no that never happened when 20 it possibly could have. I mean -- 21 Q. So you might have heard of an incident 22 involving Mr. McAlpin? 23 A. Possibly. 24 MR. LELAND: Speculation. 25 THE WITNESS: Yeah, I mean, it's possible.</p>	<p style="text-align: right;">Page 52</p> <p>1 just -- I feel like I would be lying to you if I 2 said yes, I've heard this or no, I have not heard 3 this. And I only what to go with what I've been 4 involved in and not off of hearsay or rumors. 5 Q. Well, finish. 6 A. I'm done. 7 Q. Well, obviously, have you ever had a 8 deposition taken before today? 9 A. Whenever I had that motor vehicle 10 accident. 11 Q. Okay. Well, obviously, when I ask a 12 question I just want the truth to the question that 13 I'm asking. Okay? So if I ask was there a culture 14 of violence and you say yes, I just want to know why 15 you say yes other than I don't want to lie to you. 16 A. Okay Well, I would not say there was a 17 culture of violence. I would say that there has 18 been violence at times within the Rankin County 19 Sheriff's Department during their existence. I'm 20 sure there has been violence before. 21 Q. What have you witnessed? 22 A. I've not witnessed any violence. I mean, 23 just where somebody was being -- their rights just 24 being totally violated or anything such as that. I 25 mean, I would say if I'm arresting this guy and he's</p>
<p style="text-align: right;">Page 51</p> <p>1 There's no way that I can say no or yes to that. I 2 mean, that's -- 3 BY MR. WALKER: 4 Q. When you all were at your sentencing, and 5 this wasn't your attorney but there was an attorney 6 that referred to a culture of violence that existed 7 within the Rankin County Sheriff's Department. And 8 Mr. Dedmon at his allocution of his sentencing made 9 statements that backed up, as did Mr. Elward. Do 10 you believe that there's a culture of violence that 11 existed within the Sheriff's Department? 12 MR. LELAND: Object to form. 13 BY MR. WALKER: 14 Q. You can answer. 15 A. Possibly. I just -- I would say sure. 16 Yes. 17 Q. Yes. Okay. Why do you say yes? 18 A. Because, like I said, I just -- I don't 19 know if I would -- I would say that it's just a 20 culture of violence other than it's just the -- I 21 don't know why I would say yes. I mean, I feel like 22 I'm -- I guess I'm just afraid that I would be lying 23 to you if I say no and then there's times from 2010 24 to 2023 that I may have heard some things, rumors, 25 and I can't give you specifics so I feel like I'm</p>	<p style="text-align: right;">Page 53</p> <p>1 fighting with me then that's violence. That's 2 violence between him and me. 3 Q. All right. Well, let me -- 4 MR. LELAND: Hang on. He's not quite done 5 yet. 6 THE WITNESS: And, but as far as people 7 being abused, like I said, I could not say that it 8 has never happened. And could I give you a specific 9 thing that I may or may not have seen. 10 BY MR. WALKER: 11 Q. Okay. Let me go back to my original 12 question because I don't want what you cannot attest 13 to but I do want what you can attest to. And my 14 question as originally posed was that Christian 15 Dedmon affirmed that there was a culture of 16 violence. I think his exact words were there was a 17 culture of doing things were his exact words. And 18 that he did things to show off to those who came 19 before him and who would become his boss. All 20 right? Those are his exact words. 21 A. Okay. 22 Q. Hunter Elward, I don't have his exact 23 words but in order to have done the right thing he 24 would have had to have gone back seven years to when 25 he joined the department in order to do the right</p>

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<p style="text-align: right;">Page 54</p> <p>1 thing. So each of them spoke to violation of 2 constitutional rights, abuse, and violence that has 3 been going on during the tenure at the department. 4 So my question to you is not whether you 5 had to become violent within the context of somebody 6 resisting arrest. My question to you is, is there a 7 culture of violence and abuse within the department 8 of which you are aware? 9 MR. LELAND: Object to form. 10 THE WITNESS: No. 11 BY MR. WALKER: 12 Q. When the call went out about the 13 availability for the mission, everybody knew what 14 that meant. Right? 15 A. I wasn't a part of that. 16 Q. You weren't a part of that call? 17 A. Not at that time. No, sir. 18 Q. Okay. So were you a part of the group 19 text when the issue of no bad mugshots went out? 20 A. Yes, sir. 21 Q. All right. Did you know what no bad 22 mugshots meant? 23 A. I would only have left to assume what that 24 would mean. We never discussed like, hey, this is 25 what bad mug shots means. Just like anybody in this</p>	<p style="text-align: right;">Page 56</p> <p>1 mean do not beat up on these guys. 2 Q. Or don't beat up in any visible way that 3 would be picked up when they took their mugshots. 4 A. Or say don't beat up on them in any way 5 because when we carry them to jail they're going to 6 photograph any injuries that they have. 7 Q. So they make them strip down before they 8 photograph any injuries? 9 A. I've never worked in bookings so I don't 10 know the process. 11 Q. Okay. Well, why are you able to say that 12 they're going to photograph any injuries they have? 13 A. Because whenever I come to prison they -- 14 and you've got any injuries or anything and they 15 would photograph them if I had them. 16 Q. And you said when you came to prison. Do 17 you mean after you were arrested? 18 A. Correct. 19 Q. Okay. But that's -- but you started out 20 at the jail. That was your first job working as a 21 corrections officer at Rankin County Jail. Right? 22 A. Yes, sir. 23 Q. Okay. What was the process when somebody 24 came in? 25 A. I did not work in booking. I was in the</p>
<p style="text-align: right;">Page 55</p> <p>1 room would come up with the same conclusion that I 2 could. Which would be that nobody -- no bruising on 3 the face or whatever. 4 Q. Well, you have to be hit in the face in 5 order to be bruised in the face. Right? 6 A. Right. 7 Q. Okay. So that would be an instruction, 8 don't hit anybody in the face? 9 A. I can only assume that just like anybody 10 else. That's correct. 11 Q. Would you also assume that it meant it's 12 okay to hit them anywhere just as long as it wasn't 13 the face? 14 A. I would not assume that it's okay to hit 15 anybody anywhere. The minimum amount to affect 16 arrest but to just make somebody a punching bag, I 17 would not say that that was allowed or okay. 18 Q. But it was implied that there was going to 19 be violence when the text was sent, "No bad mug 20 shots." Isn't that right? 21 A. Again, I did not read that until after all 22 this. But afterwards, coming on the backside and 23 seeing it for the first time in the criminal part, I 24 would think that. By reading that I would think 25 that, too. Like, hey, no bad mugshots. That would</p>	<p style="text-align: right;">Page 57</p> <p>1 back. I was working in a tower and watching a pod 2 of inmates. I've never worked in booking. 3 Q. So you don't know if they made them strip 4 down and recorded any injuries to their bodies or 5 not? 6 A. I do not. I do know that they performed a 7 strip search which I was never any part of. But 8 they, when you carry somebody to jail they're going 9 to take them, strip them out of their clothes, and 10 they ask them, do you have any injuries? Now, and 11 I'm going to go back to Elward for a second. Elward 12 was the person who invited you to come along and 13 your response was, "I'm already in the 14 neighborhood." 15 A. No, sir. 16 Q. Who invited you? 17 A. Dedmon. 18 Q. Dedmon said, "LT, why don't you go along?" 19 A. Yes, sir. 20 Q. And you're already in the neighborhood? 21 A. That's correct. 22 Q. Okay. And you would agree with me that 23 Dedmon pretty clearly went there for illegal 24 activity. In other words, to perform illegal 25 activity, not looking for it.</p>

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<p style="text-align: right;">Page 58</p> <p>1 A. No, sir. That would have been -- that</p> <p>2 never crossed my mind that Dedmon was going there to</p> <p>3 do the illegal activity.</p> <p>4 Q. Okay. I'm not asking about your mind</p> <p>5 right now. I think it's been established that -- I</p> <p>6 picked it up in Faux Christian Desmond to go handle</p> <p>7 the situation at 135 Conerly Road.</p> <p>8 Do you agree with me?</p> <p>9 A. Yes, sir.</p> <p>10 Q. All right. And Dedmon then asked if</p> <p>11 people were available for a mission.</p> <p>12 Do you agree with me on that?</p> <p>13 A. That's right.</p> <p>14 Q. And then you got looped in.</p> <p>15 A. That's correct.</p> <p>16 Q. All right. And then Dedmon was giving</p> <p>17 instructions about avoiding cameras, no bad mug</p> <p>18 shots, and working easy, to which your direct</p> <p>19 report, Mr. Elward, responded with a crying baby.</p> <p>20 Do you agree to all those things</p> <p>21 happening?</p> <p>22 A. Okay.</p> <p>23 Q. So are you now telling me you're the only</p> <p>24 person who didn't contemplate that there was going</p> <p>25 to be some abuse and some violation of rights going</p>	<p style="text-align: right;">Page 60</p> <p>1 alarm.</p> <p>2 MR. WALKER: All right.</p> <p>3 MR. LELAND: Give me about two minutes.</p> <p>4 MR. WALKER: So let's go off --</p> <p>5 MR. LELAND: About 60 seconds.</p> <p>6 MR. WALKER: All right. We're off the</p> <p>7 record till Don comes back.</p> <p>8 THE VIDEOGRAPHER: Please stand by. The</p> <p>9 time is 11:33 a.m. and we are off the record.</p> <p>10 (WHEREUPON, a recess was taken.)</p> <p>11 THE VIDEOGRAPHER: We are on the record.</p> <p>12 The time is 11:40 a.m. You may now proceed.</p> <p>13 THE REPORTER: Let me play back your last</p> <p>14 question as asked from Mr. Walker. One moment,</p> <p>15 please.</p> <p>16 (WHEREUPON, the record was played back.)</p> <p>17 THE REPORTER: That was the recording,</p> <p>18 sir.</p> <p>19 THE WITNESS: That was the recording.</p> <p>20 THE REPORTER: Would you like me to play</p> <p>21 that back one more time?</p> <p>22 MR. WALKER: One more time. Thank you.</p> <p>23 THE REPORTER: Yes, sir. One moment.</p> <p>24 (WHEREUPON, the record was played back.)</p> <p>25 BY MR. WALKER:</p>
<p style="text-align: right;">Page 59</p> <p>1 on at 135 Conerly Road when you all got there?</p> <p>2 A. As I stated before, I did not read any of</p> <p>3 that that you just said till after the fact, after</p> <p>4 we had been charged with the criminal thing. So I</p> <p>5 cannot say that before we got to that entrance that</p> <p>6 I thought that there was going to be some criminal</p> <p>7 activity going on.</p> <p>8 Q. Okay.</p> <p>9 A. Or that there may be. I was not aware to</p> <p>10 say, like, hey, we're fixing to go do something</p> <p>11 illegal where I could stop that or anything such as</p> <p>12 that.</p> <p>13 Q. All right. But my question was not</p> <p>14 necessarily what you were thinking. My question is</p> <p>15 --</p> <p>16 MR. LELAND: Trent?</p> <p>17 BY MR. WALKER:</p> <p>18 Q. -- if everybody else already knew what was</p> <p>19 what.</p> <p>20 A. I can't say what they thought.</p> <p>21 Q. Okay. So --</p> <p>22 MR. LELAND: Trent? Trent?</p> <p>23 MR. WALKER: Yes?</p> <p>24 MR. LELAND: Hang on a minute I've got to</p> <p>25 get a charger cord. My phone gave me a low battery</p>	<p style="text-align: right;">Page 61</p> <p>1 Q. All right. So I guess the train of</p> <p>2 thought that I was on when we went off the record</p> <p>3 was it seems apparent, at least to me from looking,</p> <p>4 that they went there that night for the purpose of</p> <p>5 violating constitutional rights of whoever was at</p> <p>6 that house. Do you agree with me on that?</p> <p>7 MR. LELAND: Object to form.</p> <p>8 THE WITNESS: That's not a question that I</p> <p>9 can answer. That's -- I'm not going to speculate</p> <p>10 what they were thinking or saying by those messages.</p> <p>11 Q. Okay.</p> <p>12 A. I'm not -- I cannot answer that.</p> <p>13 Q. All right. Tell me, and I know I asked</p> <p>14 you earlier, what you told MBI.</p> <p>15 A. Okay.</p> <p>16 Q. All right. Tell me from beginning to end</p> <p>17 what you recall happening when you arrived. You all</p> <p>18 left the fire station and what happened?</p> <p>19 A. This is the -- what did happen, not what I</p> <p>20 told MBI.</p> <p>21 Q. Okay. What really happened?</p> <p>22 A. When we left the fire department, Dedmon</p> <p>23 never stopped at the fire department. He just went</p> <p>24 by. And Opdyke and Elward were already in their</p> <p>25 vehicles and they took off behind me. They turned</p>

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<p style="text-align: right;">Page 62</p> <p>1 onto Conerly Road and they were moving much faster 2 than I was. So they got ahead of me. And I seen 3 them turning into a driveway. I'm looking up 4 Conerly Road and I seen them turn left into a 5 driveway. And I also seen vehicle headlights coming 6 from the other way.</p> <p>7 Q. Okay.</p> <p>8 A. And they turned across in front of that 9 vehicle. So I slowed and I was waiting for that 10 vehicle. I even flashed my headlights waiting for 11 that vehicle to come by and -- because I'm thinking 12 that they cut that vehicle off. Like so I'm waiting 13 for that vehicle to go by. But then they flashed 14 their headlights at me so I went ahead and turned 15 in. And when I turned in, I pulled up and parked. 16 And Opdyke, Elward and Dedmon, none of them were in 17 their vehicles. The vehicle that flashed its 18 headlights to me was coming in the driveway. And I 19 turned and seen and recognized that it was Brett 20 McAlpin. So I waited for him to pull up and I spoke 21 to him when he got out of the truck. And then I 22 turned and walked down to the house and entered into 23 the house. And there was nobody in that -- what 24 used to be a garage, it was turned into a bedroom. 25 Nobody in there so I continued into the house. The</p>	<p style="text-align: right;">Page 64</p> <p>1 some point I had went back to my truck and got a 2 flashlight or my phone or something, I don't 3 remember exactly what I went and got but I went back 4 to my truck for something and come back and at one 5 point I had to pee so I went out the back door and 6 went to the corner of the house and used the 7 restroom and come back through the back door. And 8 when it was -- I don't remember exact but we was in 9 that back bedroom again after that stuff had 10 happened, me going outside to get this, me going 11 outside to pee, and then we was in that back bedroom 12 when we heard the gunshot. And McAlpin looked at me 13 and he said, "What was that?" And I said, "I don't 14 know." And so I turned and went up the hallway and 15 that's when I met Elward.</p> <p>16 Q. And what did Elward say?</p> <p>17 A. Elward said, "LT, I just fucked up." And 18 I said, "What did you do?" He said -- he said, "I 19 thought my gun wasn't loaded." I said, "What in the 20 hell did you do?" And he said, "I shot him." I 21 said, "What?" I said, "Did you kill him?" He said, 22 "I don't know." So I said, "Man." And McAlpin was 23 standing there and everybody else was grouped up. 24 All the other ones had come in there, too. Opdyke, 25 Hartfield, Dedmon. And Brett's like, "Man." I just</p>
<p style="text-align: right;">Page 63</p> <p>1 door was open. Back up. The door was open and --</p> <p>2 Q. The door to the garage/bedroom?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Okay.</p> <p>5 A. And then I went -- you leave that and you 6 go up and you're directly into the kitchen. And 7 there was nobody in the kitchen. So I went to my 8 left and that's the living room. And that is where 9 Elward was with I think it was Mr. Jenkins, I think. 10 And Mr. Jenkins was handcuffed. I walked past them 11 and Dedmon was right there at the end of the hallway 12 or the beginning of the hallway with Mr. Parker. I 13 walked past them, and Opdyke was standing in the 14 hallway. And I asked him has he cleared the rest of 15 the house and he said no. So we went and we cleared 16 the rest of the house. And whenever I was coming 17 out of the master bathroom is when I encountered 18 Brett inside the house.</p> <p>19 Q. Okay.</p> <p>20 A. And we small talked for a few minutes and 21 then he started telling me about the murder that had 22 happened there. He told me about a shop or a shed 23 or something that had been burned there that they 24 had like an arson case or something. So we -- I 25 don't know how long we talked but we talked and at</p>	<p style="text-align: right;">Page 65</p> <p>1 had already left and I was like I was leaving and I 2 told Dedmon, I was like, "Call for medical. Call 3 for medical." And he's like, "Okay." And I'm 4 walking, going in there to where Mr. Parker was and 5 I looked at Dedmon a third time. I said, "Call for 6 friggig medical." And he called for medical. And 7 Mr. Parker -- I mean, Mr. Jenkins was on his back 8 and making a gurgling noise with blood in his mouth. 9 And I moved him up to his side so he would not 10 aspirate or drown. And then I was trying to find 11 out, because Hunter never said where he had shot 12 him, and I was looking to see where he was. I don't 13 know where Hunter was at this time. I don't know 14 where anybody was at this time. Now I'm looking at 15 Mr. Jenkins to see where he was shot at and I could 16 see he was -- where I pulled him up on his side, his 17 knee was pulled up, his left knee was pulled up and 18 he was not completely face down but I could see 19 whenever I was standing behind him, I was looking 20 and I seen it looked like an exit wound right here.</p> <p>21 Q. In his jaw?</p> <p>22 A. Right. Correct.</p> <p>23 Q. Okay.</p> <p>24 A. And I went -- at that point Dedmon called 25 for medical somewhere in there after that third time</p>

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66 to 69

<p style="text-align: right;">Page 66</p> <p>1 I told him, and I went out to my truck and was 2 trying to find my medical kit that I have, like a 3 trauma kit, just a little basic gauze and scissors 4 and clot stuff or something when the first fireman, 5 volunteer fireman showed up.</p> <p>6 Q. Okay. How long was it from the time you 7 arrived to the time that you heard this gunshot?</p> <p>8 A. No idea. No idea. It was a -- it was a 9 pretty good timeframe. I mean --</p> <p>10 Q. By pretty good you mean like 10 minutes, 11 an hour, a half hour?</p> <p>12 A. I would think maybe anywhere from 30 to 45 13 minutes. It could have been longer. I don't -- I 14 don't remember.</p> <p>15 Q. So you all had been at the house 30 or 45 16 minutes to your best recollection?</p> <p>17 A. Possibly, to my best recollection.</p> <p>18 Q. And in that 30 to 45 minutes, did you 19 witness anybody beating Michael Jenkins or Eddie 20 Parker?</p> <p>21 A. No, sir.</p> <p>22 Q. You never saw anybody lay a hand on them?</p> <p>23 A. I see Elward get Jenkins up off the floor 24 and he roughly put him over to the couch. He didn't 25 throw him. He didn't -- I never seen him hit, do</p>	<p style="text-align: right;">Page 68</p> <p>1 A. Because I -- I cannot say. I was in a 2 different room so I did not know if it happened or 3 not.</p> <p>4 Q. All right. Well, it seems to me that that 5 would be an awful lot of commotion for you not to 6 notice.</p> <p>7 A. There's -- any time you do something like 8 that there's a lot of commotion anyway. It's not a 9 calm procedure whenever you go into somebody's house 10 and do that. People are like, I mean, the police 11 are being live. The victims or suspects or whatever 12 at that time are being loud. I mean, and --</p> <p>13 Q. I mean, but by your estimation they were 14 being loud for 30 or 45 minutes.</p> <p>15 A. No, sir. They was not loud for like from 16 the time I walk in till the time this happened that 17 it was just screaming and chaos for 30-45 minutes. 18 No, sir.</p> <p>19 Q. Okay.</p> <p>20 A. There was --</p> <p>21 Q. You didn't see any tasing. I'm sorry, 22 again, finish.</p> <p>23 A. The tasing -- I want to get to my part of 24 that.</p> <p>25 Q. Okay.</p>
<p style="text-align: right;">Page 67</p> <p>1 any of whatever but I say -- I'm not trying to 2 downplay it. I'm trying to tell you exactly. He 3 grabbed him and roughly put him up on the couch. It 4 got him stood up and just shoved him back onto the 5 couch.</p> <p>6 Q. Okay.</p> <p>7 A. And that was just it. But as far as 8 anybody else, no, sir.</p> <p>9 Q. Did you witness anybody use racially 10 charged language that called either Mr. Parker or 11 Mr. Jenkins the "N word"</p> <p>12 A. No, sir.</p> <p>13 Q. Or they were calling him monkey?</p> <p>14 A. No, sir.</p> <p>15 Q. Okay. You're saying that didn't happen or 16 you just wasn't present when it happened?</p> <p>17 A. I wasn't present.</p> <p>18 Q. Okay. Because you were in a different 19 room?</p> <p>20 A. Correct.</p> <p>21 Q. All right. Did you witness Mr. Jenkins 22 and Mr. Parker being tased at any point?</p> <p>23 A. No.</p> <p>24 Q. All right. You didn't because you were in 25 a different room or because it didn't happen?</p>	<p style="text-align: right;">Page 69</p> <p>1 A. Because I want to say that I never seen 2 any of them tase anybody.</p> <p>3 Q. All right.</p> <p>4 A. But do you want me to go to that other 5 part now or is it something we'll get to later or --</p> <p>6 Q. Well, I want to make sure that you've 7 given a complete answer to your question.</p> <p>8 A. Okay.</p> <p>9 Q. I don't want to be cutting you off when 10 you have more to say.</p> <p>11 A. Okay. Well, Elward had told me at some 12 point in there, he said, "Hey, LT, my Taser is 13 messed up." And I said, "What's wrong with it?" 14 And he had no cartridge on it. The cartridge is 15 what retains the darts. And, but if you pull the 16 cartridge off, you can fire the Taser without it, 17 you know, obviously shooting in the dark is the hard 18 stuff. And the arc goes from one little metal probe 19 to the other one, the electric arc. And you can 20 pull the trigger and you can watch it go across. 21 But what happened to his is that it was running to 22 the side of the Taser or something. It wasn't going 23 across.</p> <p>24 Q. Okay.</p> <p>25 A. It was running to the side. And he showed</p>

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70 to 73

<p style="text-align: right;">Page 70</p> <p>1 me this. And I said, "Well, we'll just have to get 2 another one or something, get it fixed. I don't 3 know." And he said, "Because whenever I come in it 4 wouldn't fire. When I first tried to use it, it 5 wouldn't work." And I was like, "Okay." And then 6 he said, "But then it worked." So I was willing 7 enough to assume that he possibly may have tased 8 somebody or either he just shot into another 9 direction. But I never witnessed nobody being 10 tased. I never -- that was the first I heard about 11 anything with a Taser. And later in the whole ideal 12 I was walking out and Dedmon said, "Hey, LT, which 13 one do you think would hurt worse, this Taser" -- 14 because I didn't have a Taser -- "this Taser," and 15 he handed me his, "or Hartfield's?" So I pulled the 16 cartridge off of Dedmon's and pulled the trigger. 17 Now, Mr. Parker was sitting down as far as you are 18 from me now. And whenever I did that he was twisted 19 away from, like his feet was, like if I'm facing 20 him, like his feet would be this way but he was 21 sitting out. Do you understand what I mean? 22 Q. Okay. 23 A. And whenever Dedmon asked me that, I 24 noticed Parker turned toward me. He's still sitting 25 down and he turned toward me. And whenever I did</p>	<p style="text-align: right;">Page 72</p> <p>1 each of them they were already handcuffed? 2 A. Correct. 3 Q. And were you part of any search for drugs 4 in the house? 5 A. No, sir. 6 Q. You just cleared the house with Opdyke? 7 A. Yes, sir. 8 Q. All right. And then the remainder of your 9 time in the house was spent in the bedroom talking 10 to -- 11 A. McAlpin. 12 Q. -- McAlpin. So when the eggs were being 13 thrown at these two gentlemen where were in? 14 A. In that back bedroom. 15 Q. In the back bedroom. 16 A. Or either maybe -- I don't know where I 17 was when that happened because I didn't even -- I 18 didn't know that happened. I could have been 19 outside using the restroom or into my truck. But I 20 was -- I did not -- I was not in that room. 21 Q. Okay. So when the chocolate was squeezed 22 all over them, you never saw either of them with 23 chocolate all over them? 24 A. No, sir. 25 Q. Or milk?</p>
<p style="text-align: right;">Page 71</p> <p>1 that he was like putting his feet up, which did give 2 me an indication that he was -- something had gotten 3 him to do that. But I never touched him. And then 4 Hartfield in turn did the same thing by dry firing 5 his. And but he never -- I never seen him touch 6 nobody with it, Hartfield. But it was a thing where 7 it was -- what it was was comparing this old style 8 Taser to the new one. And I told Dedmon, handed him 9 his Taser back, I said, "Most definitely I would 10 think Hartfield's would hurt worse." 11 Q. Well, do you -- when you say that when you 12 dry fired I guess it was Dedmon's Taser -- 13 A. Correct. 14 Q. -- that then Mr. Parker raised his leg as 15 if to put himself in a defensive position? 16 A. Correct. 17 Q. All right. And to your mind that meant he 18 had been tased? 19 A. At the -- at the moment it didn't maybe 20 register with me but after I thought about it later 21 I was like I bet -- I'm sure that's why he did that 22 was because he was thinking that I was fixing to 23 possibly tase him. But and that possibly that that 24 may have happened to him earlier in the night. 25 Q. Okay. And, of course, when you first saw</p>	<p style="text-align: right;">Page 73</p> <p>1 A. No, sir. 2 Q. Okay. You never saw them waterboarded 3 using liquor and water? 4 A. No, sir. 5 Q. You never saw warm grease being poured 6 over either of the two of them? 7 A. No, sir. Whenever I walked back and 8 encountered all of them again -- when I say all of 9 them I'm referring to those, Opdyke, Hartfield, 10 Dedmon, and Elward. Because I would say 90 percent 11 of the time myself and McAlpin were in that back 12 bedroom or either had stepped outside. Hatfield was 13 standing in the hallway at the bathroom and I said, 14 "What are you all doing?" Because I didn't see any 15 of the victims/suspects. I didn't see any of them. 16 I said, "What are you all doing?" And Hartfield 17 said that they're taking a shower. And I said, "For 18 what?" And he said, "Well, actually, to be cleaned 19 up." And I said, "For what?" He said, "Oh, they 20 had some chocolate on them." I was like -- and that 21 was as far as that went. I just shook my head and 22 walked off. But to have seen them prior with 23 anything on, no, sir, I never seen them with 24 anything on them and that was my first. 25 Q. Okay. Now, what I'm listening to you</p>

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<p style="text-align: right;">Page 74</p> <p>1 saying, you're the shift lieutenant. Something 2 clearly is awry here. Would you agree? 3 A. Something could be awry. 4 Q. And as the shift lieutenant you didn't see 5 any sort of responsibility to find out whether or 6 not that was true, that something was awry or that 7 your concerns were baseless? 8 A. I guess, did I see any -- nothing stood 9 out. If they would have told me, oh, we just got 10 through pouring chocolate syrup all over them or we 11 just did this, he just said he had chocolate on him. 12 So I did not know. 13 Q. At what point in time -- where were you 14 when the dildo was being used on them? 15 A. I do not know where I was at. I was not 16 in the room. 17 Q. You were not in the room? 18 A. I don't know where I was at when they did 19 that because I don't know when they did that. 20 Q. Mr. Middleton, would it be a fair 21 statement that there was a lot of torture and 22 violation of constitutional rights to put it lightly 23 and you made a conscious effort to be anywhere but 24 where that was happening? 25 A. That would be a false statement. I did</p>	<p style="text-align: right;">Page 76</p> <p>1 wouldn't have a clue, but the only thing was, I 2 don't know who laid it there but it was on the hood 3 of my truck when I walked out to my truck. 4 Q. What? 5 A. The bar mat. And I grabbed it and took it 6 back into the house. And I never stole a bar mat. 7 I never took a bar mat out of the house nor any 8 other items. But the bar mat was on my truck 9 whenever I walked outside. I don't know who placed 10 it there but I carried it back in the house. 11 Q. What did you see your role as being that 12 evening? 13 A. Just to, like I said earlier, like I 14 wanted to go over there and see, you know, this 15 house where there supposedly selling narcotics 16 almost in the backyard of our chief investigator's 17 house. 18 Q. Who told you they were selling narcotics 19 out of the house? 20 A. That's what they said. They said we've 21 got narcotics -- our mission, that's what it was. 22 Q. So Dedmon said that they were selling 23 narcotics out of the house? 24 A. He said we've got this -- "Come over here. 25 Why don't you come over here, LT?" I said, "I'm</p>
<p style="text-align: right;">Page 75</p> <p>1 not put myself somewhere where I could not be a 2 witness to that. I did not know that was going on. 3 I was back there in the room discussing with McAlpin 4 about a murder that happened at that house. Nothing 5 further than that. I was not staying back there 6 with McAlpin so that they could do illegal things, 7 violating anybody's rights or anything such as that. 8 Q. So were you present when the home 9 surveillance system was stolen? 10 A. No, sir. 11 Q. But that would be in keeping with making 12 sure that there were no cameras that could record 13 what went on that day? 14 A. The reason that they did that? 15 Q. Yeah. 16 A. The reason that they stole that? 17 Q. Yes. 18 A. I would only assume that's the reason they 19 stole that. 20 Q. Now, it was also stated that you and Mr. 21 McAlpin stole bar mats, military uniforms, and some 22 other items from the residence. 23 A. The only thing, it was a bar mat. As far 24 as my knowledge, the military uniform never moved 25 from the closet. And as far as any other items, I</p>	<p style="text-align: right;">Page 77</p> <p>1 already in the area." And whatever I seen, not back 2 at Edwards, at the fire department, that's when they 3 was telling me that they're supposed to be selling 4 dope out of there. And I want to say that I may 5 have text McAlpin in there somewhere. I don't 6 remember that if -- somewhere I had an indication 7 that that's what -- well, honestly, if the narcotics 8 investigator is over there going to a knock and 9 talk, that's what he's going to do because they're 10 selling narcotics. 11 Q. Did you ask did they have a warrant to 12 search the house? 13 A. No. No, sir. 14 Q. Okay. And are warrants common if you're 15 going to do a knock and talk? 16 A. No, sir. 17 Q. So if you're doing the knock and talk you 18 wouldn't have a warrant? 19 A. No, sir. 20 Q. All right. Now, were they actually going 21 to do a knock and talk or were they going over there 22 for the purpose of doing what they eventually did or 23 what you all eventually did? 24 A. I do not know because I told you when I 25 became aware of the deal. I did not know what their</p>

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78 to 81

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1 intentions were.
2 Q. Earlier you said that Dedmon had a
3 reputation for getting out of hand. And at the
4 point in time you heard that you're shift
5 lieutenant?
6 MR. LELAND: Object to the form.
7 THE WITNESS: At that time was I a
8 lieutenant?
9 BY MR. WALKER:
10 Q. Yeah.
11 A. I mean, I had heard it before I was, I mean, a
12 lieutenant.
13 Q. Okay. Did you hear it when he was working
14 under you?
15 A. Possibly. I can't recall the exact date or
16 time.
17 Q. That he was getting out of hand?
18 A. Not, I mean, like he was -- he was more --
19 I wouldn't say he was getting out of hand. He was
20 more animated, just like I told him about standing
21 in front of that lady jumping up and down and
22 yelling.
23 Q. Did you observe that when he was working
24 under you?
25 A. No. He was narcotics then.

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1 Q. When you observed him yelling at the lady?
2
3 A. Right.
4 Q. All right. Had you heard when he was
5 working under you that he could get out of hand?
6 A. No, sir.
7 Q. Okay. But when he became narcotics he
8 gained the reputation for getting out of hand?
9 A. Possibly. That's when I started hearing
10 things.
11 Q. That's when you started hearing things.
12 Did you ever discuss those things that you were
13 hearing with Sheriff Bailey?
14 A. No, sir.
15 Q. Did you ever discuss it with the
16 undersheriff?
17 A. I don't think so. I never really had any
18 discussion with the sheriff or undersheriff other
19 than they may text me and tell me they need me to
20 get some guys to go over here for people running
21 stop signs. You know, just basically pass
22 information along, but.
23 Q. Let me ask you, it seems like there's a
24 lot of leeway for this particular activity to take
25 place. How did you all account for Taser use?

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1 A. If you used your Taser, policy was that
2 you would take it to have it downloaded. That you
3 had to do a use of force report.
4 Q. Okay. And you described earlier that you
5 were testing out Elward's Taser because he said it
6 didn't work, right?
7 A. I never tested his Taser. He was showing
8 me.
9 Q. He was just showing you?
10 A. Correct.
11 Q. Okay. So he had triggered off his Taser?
12 A. Correct.
13 Q. All right. So is he supposed to file a
14 use of force report for that?
15 A. No.
16 Q. All right. But if he uses his Taser on a
17 person then he's supposed to file a use of force
18 report and download the Taser?
19 A. Correct.
20 Q. But if he triggered his Taser not at a
21 person he didn't have to download that?
22 A. Correct.
23 Q. Well, doesn't that leave a lot of room for
24 a person to use their Taser on someone who has been
25 detained or arrested and say, well, I was just

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1 testing it?
2 A. In training for the Taser to get a Taser
3 that is one thing at the beginning of your shift
4 that they say is that you fire your Taser without a
5 cartridge at the beginning of a shift to make sure
6 it's working properly. And so that's just things
7 that anybody with a Taser would do is just to make
8 sure it's working properly throughout. Or not
9 throughout but just periodically.
10 Q. And your shift is 11 a.m. to 11 p.m.?
11 A. Correct.
12 Q. All right.
13 A. And so as far as, I mean, I answered your
14 question. I mean, I would guess that somebody could
15 fire their Taser without touching anybody or
16 shooting anybody with it or anything like that and
17 not have to file a report on that.
18 Q. And conversely, they could actually shoot
19 someone and say I was just checking it to make sure
20 it worked and not file a report on that?
21 A. We can speculate that kind of stuff all
22 day long.
23 Q. Well, I'm asking isn't that quite possible
24 to do?
25 A. As a hypothetical? It's quite possible

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<p style="text-align: right;">Page 82</p> <p>1 that they could not have as well.</p> <p>2 Q. Okay. So by saying it's possible they</p> <p>3 could not have it's also possible they could?</p> <p>4 A. I would say sure.</p> <p>5 Q. Okay.</p> <p>6 A. I mean, you've got -- yes, sir.</p> <p>7 Q. And Elward came to you after 9 o'clock at</p> <p>8 night saying my Taser is not working correctly and</p> <p>9 he was supposed to know that at 11:00 that morning.</p> <p>10 A. And he was supposed to have known that?</p> <p>11 Q. Because he was supposed to test it at the</p> <p>12 beginning of his shift.</p> <p>13 A. Correct.</p> <p>14 Q. So a 11:00 that morning he should have</p> <p>15 said, "LT, my Taser's not working correctly."</p> <p>16 A. Unless it was working at 11:00 that</p> <p>17 morning when he tested it. Because that's a tool</p> <p>18 that he would need to do his job and he would want</p> <p>19 to come to me and make sure that he had proper</p> <p>20 equipment.</p> <p>21 Q. Okay. But then wouldn't it also</p> <p>22 conversely mean that he had used his Taser that</p> <p>23 night to be able to tell you that it wasn't working</p> <p>24 correctly?</p> <p>25 A. Correct. That's what I said. He said</p>	<p style="text-align: right;">Page 84</p> <p>1 holstering his pistol.</p> <p>2 Q. Okay. So you did hear him fire off a</p> <p>3 round inside the house?</p> <p>4 A. Right. At that time. Yes, sir.</p> <p>5 Q. Okay. Because I thought I understood you</p> <p>6 to say earlier that you did not hear that.</p> <p>7 A. But the question I understood that you</p> <p>8 were asking at that point was did I hear him fire a</p> <p>9 round at the same time Hunter Elward fired a round</p> <p>10 whenever Mr. Parker was shot.</p> <p>11 Q. Mr. Jenkins.</p> <p>12 A. Yeah. Again, Mr. Jenkins. Sorry.</p> <p>13 Q. Okay. But now to be clear, within a few</p> <p>14 minutes of you all entering the house you knew</p> <p>15 Christian Dedmon had fired off a round?</p> <p>16 A. Correct.</p> <p>17 Q. Near Mr. Parker?</p> <p>18 A. Correct.</p> <p>19 Q. Did you know that was a crime?</p> <p>20 A. Yes.</p> <p>21 Q. As the lieutenant on scene, why didn't you</p> <p>22 call a halt to this?</p> <p>23 A. That's a very good question. And I don't</p> <p>24 have a good answer to that at all as to why I did</p> <p>25 not do that. I did not -- I didn't want to deal</p>
<p style="text-align: right;">Page 83</p> <p>1 that he tried to use his Taser and it didn't work.</p> <p>2 And then that's when he showed me that.</p> <p>3 Q. Okay. So moving back, and you said you</p> <p>4 don't remember hearing Dedmon fire his weapon at</p> <p>5 all?</p> <p>6 A. I said that I never remember hearing a</p> <p>7 distinct oh, no, we used it on -- when Parker got</p> <p>8 shot.</p> <p>9 Q. Jenkins.</p> <p>10 A. Jenkins, I'm sorry. Whenever Mr. Jenkins</p> <p>11 was shot. Prior to that it's -- whenever Dedmon</p> <p>12 shot that round, he wasn't even standing beside</p> <p>13 Parker.</p> <p>14 Q. You saw that?</p> <p>15 A. I heard that.</p> <p>16 Q. You heard it?</p> <p>17 A. Right.</p> <p>18 Q. Where were you when that occurred?</p> <p>19 A. I was in the hallway.</p> <p>20 Q. You were in the hallway?</p> <p>21 A. And the same hallway that he was in. And</p> <p>22 I was walking away and I was just about to turn into</p> <p>23 that same bedroom. And whatever -- I heard it and</p> <p>24 it scared -- scared me. And I turned around and I</p> <p>25 was like, what the heck was that? And he was</p>	<p style="text-align: right;">Page 85</p> <p>1 with Dedmon because like what we discussed earlier,</p> <p>2 he was -- what was the word that I used? Like that</p> <p>3 he was really animated so I did not hang around with</p> <p>4 him. Him and Sheriff Bailey were good friends and</p> <p>5 hung out together outside of work and just -- I knew</p> <p>6 just to leave him alone.</p> <p>7 Q. You know to leave Dedmon alone?</p> <p>8 A. Correct.</p> <p>9 Q. Because -- no, go on. Tell me why you</p> <p>10 need to leave him along and what did it have to do</p> <p>11 with Sheriff Bailey?</p> <p>12 A. Because that they -- I did not know but I</p> <p>13 assumed that I -- that I would just let Dedmon do</p> <p>14 Dedmon, whatever his narcotics stuff. That's</p> <p>15 another reason that I didn't hang around him. Just</p> <p>16 let him do whatever he wanted to do, whatever he</p> <p>17 did. And it seemed to me that with him being good</p> <p>18 friends with the sheriff that I would not -- I would</p> <p>19 just be totally like, hey, leave it. I don't know</p> <p>20 this but I just kind of think like, hey, if these</p> <p>21 two are good friends I'm not going to go try to get</p> <p>22 him in trouble or anything. So therefore, that's</p> <p>23 why I just stayed away.</p> <p>24 Q. Did you feel like there were sufficient</p> <p>25 concerns that the sheriff should have been made</p>

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86 to 89

<p style="text-align: right;">Page 86</p> <p>1 aware with regard to Dedmon's behavior?</p> <p>2 A. I felt like -- I felt like the sheriff was</p> <p>3 aware.</p> <p>4 Q. Why did you feel that way?</p> <p>5 A. Just because he -- the sheriff was aware</p> <p>6 of everything that happened. If somebody had a use</p> <p>7 of force report or if anybody had a complaint of</p> <p>8 being abused or anything like that he knew about</p> <p>9 that.</p> <p>10 Q. Okay. Give me an example of a complaint</p> <p>11 of abuse that Sheriff Bailey was aware about.</p> <p>12 A. I don't know if he was aware but I was</p> <p>13 only left to assume that he was aware of the other</p> <p>14 case that Dedmon and Elward and Opdyke, and in fact,</p> <p>15 there were two other deputies there, Sanford and</p> <p>16 doggone, one more, on the side of the interstate</p> <p>17 when Dedmon fired his round and --</p> <p>18 Q. Against Alan Schmidt.</p> <p>19 A. Okay. And that whole incident, well,</p> <p>20 there was a -- I heard that there was a recording</p> <p>21 where that guy had called his mother or grandmother</p> <p>22 or something from the jail phone saying what</p> <p>23 happened. And that Dedmon had the recording. And I</p> <p>24 don't know how that even words. Like how do you get</p> <p>25 the recording from the jail or anything like that.</p>	<p style="text-align: right;">Page 88</p> <p>1 yes, that's good. He wants to know about all those</p> <p>2 such things.</p> <p>3 Q. So would it be fair to say he was or is</p> <p>4 very hands on as a sheriff?</p> <p>5 A. Yes.</p> <p>6 Q. And that he wanted to have a working</p> <p>7 knowledge of all aspects of what was going on with</p> <p>8 your patrol?</p> <p>9 A. To a certain -- if it involved, you know,</p> <p>10 like just day to day things, like us just answering</p> <p>11 calls and such things like that, no. But if it</p> <p>12 involved something more, like he would -- I don't</p> <p>13 want to say more important things but like, like if</p> <p>14 we was going to go do a search warrant or something</p> <p>15 he would want to know about that.</p> <p>16 Q. Okay. So if there was going to be a</p> <p>17 search at 135 Conerly, he probably would have wanted</p> <p>18 to know about that?</p> <p>19 A. And it was my knowledge that he did. Like</p> <p>20 it's because --</p> <p>21 Q. Ahead of time?</p> <p>22 A. -- because I had been told by Dedmon or</p> <p>23 Brett or something probably, right, that anytime he</p> <p>24 was going to do anything that he would send a --</p> <p>25 Dedmon would send an email out to admin which would</p>
<p style="text-align: right;">Page 87</p> <p>1 Maybe he can get it on his own but I was just only</p> <p>2 left to assume that -- I guess assume. I want to</p> <p>3 make sure that that's said that the sheriff knew</p> <p>4 about that.</p> <p>5 Q. Based on what you -- again, you just said</p> <p>6 the sheriff knew about everything. Did he have a</p> <p>7 strong management style?</p> <p>8 MR. LELAND: Object to form. You can</p> <p>9 answer.</p> <p>10 THE WITNESS: Like if a pursuit happened.</p> <p>11 BY MR. WALKER:</p> <p>12 Q. Yes.</p> <p>13 A. And within just a few minutes the sheriff</p> <p>14 was going to be on the radio, hey, what's going on?</p> <p>15 Why are you all pursuing him? Anything like that.</p> <p>16 You know, he's going to be wanting to know, like</p> <p>17 conditions, traffic, things like that. And if he</p> <p>18 thinks that we shouldn't be pursuing, he's going to</p> <p>19 call it off immediately. So if you say that's a</p> <p>20 strong management system, that's just an example of</p> <p>21 it, I would say yes. Like if I have a juvenile</p> <p>22 missing I would call the sheriff and let him know.</p> <p>23 Like hey, we've got a juvenile missing in the woods.</p> <p>24 I just want to let you know that we're fixing to try</p> <p>25 to get the drones out and the dogs out. He's like,</p>	<p style="text-align: right;">Page 89</p> <p>1 be the sheriff, the undersheriff, and maybe the</p> <p>2 legal counsel. But I don't know who all he sent it</p> <p>3 to but he -- I had heard him said before or say</p> <p>4 before that he, yeah, he let him know what he was</p> <p>5 doing.</p> <p>6 Q. That Dedmon would or McAlpin would?</p> <p>7 A. Dedmon would. McAlpin would have been a</p> <p>8 part of that admin email or text. Now, whether or</p> <p>9 not he did that that night I do not know.</p> <p>10 Q. But that was your understanding that that</p> <p>11 was what his modus operandi was?</p> <p>12 A. Right. That anytime he's going to do any</p> <p>13 kind of narcotics investigation that he let those</p> <p>14 people know.</p> <p>15 Q. Unless, of course, it was going to be an</p> <p>16 off-the-books event.</p> <p>17 A. I cannot answer that.</p> <p>18 Q. Part of what you pleaded guilty to was</p> <p>19 that you had after the shooting offered to plant a</p> <p>20 drop gun on or near Mr. Jenkins to justify Elward's</p> <p>21 shooting of Mr. Jenkins. Correct?</p> <p>22 A. The wording is wrong.</p> <p>23 Q. Okay. How am I wrong?</p> <p>24 A. Because I didn't offer to plant it on him</p> <p>25 or anything -- how the wording was exactly, Elward</p>

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90 to 93

<p style="text-align: right;">Page 90</p> <p>1 told me that he was going to say that this was 2 while, I think, I'm not sure, I'm not sure exactly 3 at what point this was but Hunter Elward had told me 4 that he was going to say that he was unhandcuffed 5 and reached for a gun. And during while he was left 6 in a room by himself or something with him while 7 Dedmon was getting a phone where he'd be able to 8 call to set up a deal. I was leaving and Brett was 9 still there. And so I -- Brett had already left. 10 And so I asked him, I said, "Do you have a gun that 11 you're going to put down there?" I said, "I've got 12 one." And he said, "I've got it taken care of." So 13 that was the wording that was used. 14 Q. Okay. So you never retrieved your drop 15 gun? 16 A. No. 17 Q. All right. Which then brings us to the 18 question, why did you have one? 19 A. I didn't have it. It was not a drop gun. 20 It was just an old gun that was not registered to 21 me. It was an old .38 revolver that I just had 22 that, I mean, I had -- I don't even remember -- I 23 had several guns in my truck. You know, like the 24 gun that I use when I'm on the SWAT team. And that 25 was just an old gun that was in my truck.</p>	<p style="text-align: right;">Page 92</p> <p>1 A. Correct. 2 Q. The pistol that you solely used for SRT 3 operations belonged to you? 4 A. Correct. 5 Q. And then additionally there was an old .38 6 that was not registered to you or anybody else you 7 knew. 8 A. Correct. 9 Q. And you kept that in your vehicle? 10 A. Correct. 11 Q. Okay. Were there any other guns that you 12 kept in your vehicle that were not registered to you 13 or anyone else? 14 A. No. 15 Q. Okay. So why did you keep that gun in 16 your vehicle, the .38? 17 A. Back up. I did have a shotgun that was -- 18 that was the Sheriff Department's that had orange 19 stocks that was -- 20 Q. Those were for what now? 21 A. Less lethal. Like -- 22 Q. A shotgun that was for less lethal use? 23 A. Right. So it had orange -- orange stocks 24 on it. 25 Q. Okay. What, you shot like bean bags out</p>
<p style="text-align: right;">Page 91</p> <p>1 Q. So the gun you use when you're on the SWAT 2 team, that's the Sheriff Department's gun. Right? 3 A. That's my gun. 4 Q. That's your gun? The gun you use for the 5 SWAT team? 6 A. Correct. 7 Q. Okay Is your personal -- 8 A. Correct. 9 Q. -- firearm? 10 A. Correct. 11 Q. All right. 12 A. The pistol. The pistol one. The rifle 13 was not. 14 Q. Okay. So you had a pistol. Your service 15 pistol or an SRT pistol? 16 A. I had a service pistol that the Rankin 17 County Sheriff's Department supplied me with that I 18 wore daily as a deputy working. Whenever we did 19 anything with SRT I had a pistol that I had 20 purchased that was not personal that I carried in my 21 holster. And then I had a rifle that was purchased 22 by Rankin County that was assigned to me in my 23 possession as well. Actually, I had two. I had a 24 sniper rifle and like an AR-15. 25 Q. And both rifles belonged to the county?</p>	<p style="text-align: right;">Page 93</p> <p>1 of that? 2 A. Correct. 3 Q. All right. But specifically, the only 4 nonregistered gun that you had was the .38? 5 A. Correct. 6 Q. So why did you have that particular gun in 7 your -- your Rankin County Sheriff's Department 8 vehicle? 9 A. I could not give you a good answer to 10 that. The pistol that I had that I used for SRT 11 that was my personal was actually not registered to 12 me. I bought it from somebody else. So I mean, the 13 way gun registry works in Mississippi is -- and I'm 14 not trying to say that you all know this. I'm just 15 -- but if I go to Bass Pro and buy a gun and bring 16 it to you, then that gun is going to be under my 17 name. 18 Q. Mm-hmm. 19 A. But if I go to just an individual that's 20 got a gun for sale and I buy it from him then that 21 gun is not going to be registered to me. It's going 22 to be registered to the original purchaser. 23 Q. Yes. 24 A. And so the pistol that I toted with SRT 25 was not registered to me.</p>

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94 to 97

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1 Q. Because you got it from this individual?

2 A. Correct.

3 Q. And the .38 belonged to some other

4 individual and it was not registered to you.

5 A. Correct.

6 Q. Neither was it reported stolen so far as

7 you know?

8 A. Correct.

9 Q. Okay. But it was a gun that you just kept

10 --

11 A. In my vehicle.

12 Q. -- in your vehicle. And it certainly was

13 in position to come in handy that particular night?

14 A. I had -- at times I've had multiple guns

15 that I brought from home that I would shoot during

16 firearms training and stuff and maybe I just left

17 that gun in the vehicle. But I can 100 percent tell

18 you that I did not take that gun and put it in my

19 truck and say this is going to be a drop gun. But I

20 did know that it was in my vehicle that night.

21 Q. Okay. And you offered it to Dedmon if he

22 needed it and he said he had it taken care of?

23 A. I said I have this if you need it. And I

24 said I have a gun in my truck. And he said, it's

25 taken care of. I never said you can have it. I

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1 just told him it was in my vehicle. That was the

2 wording. I said, I have a gun in my truck and he

3 said it's taken care of.

4 Q. I want to back up just a second. You said

5 that you knew that Dedmon and Sheriff Bailey were

6 friends. And not to put words in your mouth but you

7 thought it might be futile to try to report anything

8 on Dedmon to Bailey because you thought Bailey

9 should already know.

10 Is that a fair statement that I just made?

11 A. I'd say fair statement and just a small

12 part of fear of backlash to me.

13 Q. From Sheriff Bailey?

14 A. Correct.

15 Q. That if you reported on Dedmon that the

16 backlash would fall on you?

17 A. Correct. But that was only my personal

18 thoughts and opinion, not that I have nothing that

19 I'd gotten from anybody else.

20 Q. Well, you'd been working at the department

21 at that point in time 13 years. What led you to

22 think that there would be backlash?

23 A. Because of their relationship.

24 Q. Had you observed their relationship?

25 A. Like I'd see them on Facebook or something

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1 like that, or something like that, yes. But no, not

2 personally because I was -- I did not hang around

3 the office. I stayed -- it was not my job to hang

4 around the office so I stayed out in the county

5 riding around. So I was not up there at the office

6 to see their relationship.

7 Q. But do you think that it was well known

8 within the department based on your observation that

9 Mr. Dedmon and Sheriff Bailey had a close, personal

10 relationship?

11 MR. DARE: Object to the form.

12 THE WITNESS: Sure. Yes. I mean, just

13 based off of what I've seen on, like I say, Facebook

14 or hearing other people say it. I mean, yes.

15 BY MR. WALKER:

16 Q. What did you see on Facebook?

17 A. They were out at a restaurant eating.

18 Dedmon was still with his wife at the time and

19 Sheriff Bailey, they took like a group picture or

20 something. And I can't remember all the things that

21 I've seen but I mean, I just, you, like I said,

22 after all that time you hear people talk. You see

23 little bits and pieces here so you put a puzzle

24 together. And I cannot give you specifics.

25 Q. But you felt enough that there would be

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1 backlash if you went to Sheriff Bailey and said,

2 hey, Dedmon's behavior is not something that should

3 be accepted in this department?

4 A. Correct.

5 Q. And you felt that Sheriff Bailey would get

6 angry and upset at you for telling him that?

7 A. I think it's possible that -- not that he

8 would like -- this is just my opinion, like not that

9 he would get upset and do anything to me right then

10 but maybe, you know, that might would -- I would

11 have a mark on my back or something. I don't know.

12 That was just my personal opinion. Like when you

13 see somebody who's got a -- are here or have put all

14 these pieces together, they've got a close

15 relationship, I'm not going to go try to get that

16 person in trouble.

17 Q. Had you ever witnessed any backlash by

18 Sheriff Bailey against any other member of the

19 department?

20 A. No.

21 Q. Was there any requirement for yearly

22 training for deputies to go through?

23 A. Firearms.

24 Q. Okay. Was there a requirement for anybody

25 to go through any training other than firearms

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<p style="text-align: right;">Page 98</p> <p>1 training?</p> <p>2 A. They -- no.</p> <p>3 Q. Was there ever a requirement that you all</p> <p>4 would undergo any training regarding police</p> <p>5 brutality or avoiding the use of excessive force?</p> <p>6 A. We did at some point during my time at the</p> <p>7 Sheriff's Department, we did take a class one time a</p> <p>8 Color of Law class.</p> <p>9 Q. Do you know when that was?</p> <p>10 A. I do not and I don't -- I don't know if</p> <p>11 Dedmon or any of those were working there at that</p> <p>12 time or not.</p> <p>13 Q. So it could have been previous to 2017?</p> <p>14 A. Right. Yes, sir.</p> <p>15 Q. And Hunter Elward became an employee</p> <p>16 around 2017 also?</p> <p>17 A. I cannot remember.</p> <p>18 Q. Do you know when Opdyke became an</p> <p>19 employee?</p> <p>20 A. No, sir.</p> <p>21 Q. Do you know if there was ever any emphasis</p> <p>22 within the Rankin County Sheriff's Department</p> <p>23 regarding the avoidance of police brutality or</p> <p>24 excessive force?</p> <p>25 A. Can you rephrase the question?</p>	<p style="text-align: right;">Page 100</p> <p>1 A. This -- the only thing on that WhatsApp or</p> <p>2 whatever the name of the group was on Chat, the</p> <p>3 heading, you know, like a group, you've got to name</p> <p>4 a group. Name the group. I guess you can just</p> <p>5 leave it blank. And I think you've got to put</p> <p>6 something in there. And at first I just added</p> <p>7 Lieutenant Middleton's Shift. And so I do not</p> <p>8 remember where I first heard the word "goon" or</p> <p>9 anything like that but I can honestly tell you,</p> <p>10 which all of this is honesty anyway but I want to</p> <p>11 emphasize that I guess from this that until this</p> <p>12 happened I never knew what a goon was. I never had</p> <p>13 heard that. I mean, the only thing that I related</p> <p>14 it to was the Goonies, a movie about some kids. And</p> <p>15 I kind of interpreted it as a bunch of like goofy</p> <p>16 people where, I don't know, I don't know how to</p> <p>17 explain it But, and I was trying to come up with</p> <p>18 their name and I had asked in the message, like hey,</p> <p>19 what's a good name for the shift? We can call it</p> <p>20 the shift. And this, that, and the other. And I</p> <p>21 don't know if somebody suggested it to me or I had</p> <p>22 done it myself. I couldn't tell you exact. And so</p> <p>23 that's the reason I started that name, the shift</p> <p>24 that worked for me that -- and again, me and two</p> <p>25 others was only there that night, a part of that</p>
<p style="text-align: right;">Page 99</p> <p>1 Q. Did anybody ever talk to you all about how</p> <p>2 to deescalate a situation so it didn't become a</p> <p>3 situation where the use of force was required?</p> <p>4 A. Training and stuff? No, sir.</p> <p>5 Q. No training on that. Do you know if</p> <p>6 anybody ever talked to you all or did you have any</p> <p>7 classes where you talked about what would or would</p> <p>8 not be a violation of civil rights?</p> <p>9 A. Only that Color of Law class.</p> <p>10 Q. The Color of Law class.</p> <p>11 A. That I can recall. That I can recall.</p> <p>12 Q. And it was probably before 2017 do you</p> <p>13 think?</p> <p>14 A. We had some FBI courses, I forgot about</p> <p>15 that, that we took online. And I can't remember</p> <p>16 what all they were but maybe one of them may have</p> <p>17 fell into that category. FBI Online Academy or</p> <p>18 something like that. And there were several classes</p> <p>19 that were required for you to do. And it was</p> <p>20 basically watching a video and then answering some</p> <p>21 questions afterwards. And, but I cannot remember</p> <p>22 what all they were. One of them could have possibly</p> <p>23 fell into that.</p> <p>24 Q. Okay. Where did the name Goon Squad come</p> <p>25 from?</p>	<p style="text-align: right;">Page 101</p> <p>1 shift. But all it was was a text message group or a</p> <p>2 message group between me and the rest of the guys on</p> <p>3 my shift to where I would say, hey, go to this. You</p> <p>4 know, like we're having trouble with speeders here.</p> <p>5 Go here. Things such as that.</p> <p>6 Q. So you said the name was suggested to you</p> <p>7 by somebody else on the shift?</p> <p>8 A. I said I couldn't remember if it was</p> <p>9 suggested or if I just thought of it or what. But</p> <p>10 --</p> <p>11 Q. But you're the person who adopted it?</p> <p>12 A. Right. Sure.</p> <p>13 Q. Okay. Whose idea was it to have those</p> <p>14 challenge coins mint?</p> <p>15 A. Matt.</p> <p>16 Q. Okay. How many did you have made?</p> <p>17 A. I cannot recall. I don't remember.</p> <p>18 Q. Do you know -- well, we know that</p> <p>19 Christian Dedmon communicated with the other</p> <p>20 deputies by a group chat. Was it on you all's</p> <p>21 nightshift chat, the Goon Squad chat?</p> <p>22 A. No, sir. He was not a part of my -- when</p> <p>23 he worked on my shift he would have been a part of</p> <p>24 that but when he left my shift he was not a part of</p> <p>25 that chat anymore. Anytime somebody new comes on</p>

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102 to 105

<p style="text-align: right;">Page 102</p> <p>1 the shift, I would add them. If they left, they 2 were taken off. 3 Q. So was that name in existence at the time 4 that Christian Dedmon was on your shift? 5 A. No. 6 Q. When did that name come into existence? 7 A. Maybe in '21 or '22. Maybe. I mean, I'm 8 not sure exactly when he did but it was -- it was 9 only a short time before this happened. 10 Q. So when -- let me ask this before I get 11 into that. 12 You said earlier that if members of your 13 shift were available and Dedmon asked, they were 14 free to go help him with an investigation. How many 15 investigators would have been on any given shift, if 16 you know? 17 A. How many investigators would be on? 18 Q. Well, as I understand it, the department 19 is divided into patrol and then investigations. And 20 investigations is divided specifically into 21 narcotics versus other major investigations. 22 A. CID and criminals? 23 Q. Yes. 24 A. And then there's juvenile investigations. 25 Q. Okay. So on any given shift, other than</p>	<p style="text-align: right;">Page 104</p> <p>1 A. No. 2 Q. Did anybody ever tell you they thought 3 Sheriff Bailey would have a problem with it? 4 A. No. 5 Q. Did anybody ever tell you they thought 6 that the Goon Squad challenge coin was improper? 7 A. No. 8 Q. Did you give Sheriff Bailey a Goon Squad 9 coin? 10 A. No. 11 Q. You didn't have to go through him to 12 approve having the challenge coin made though, did 13 you? 14 A. I did not. I'm not sure if I had to or 15 not but I didn't. 16 Q. Do you know if anybody actively tried to 17 keep the existence of the Goon Squad coin away from 18 Sheriff Bailey? 19 A. No. 20 Q. No, you don't know, or no, it did not? 21 A. I do not know if anybody actively tried to 22 keep that away from the sheriff. 23 Q. Okay. But that coin was distributed to 24 people who were outside of the nightshift. Right? 25 A. It was the dayshift but yes, it was.</p>
<p style="text-align: right;">Page 103</p> <p>1 Dedmon, how many narcotics investigators would there 2 have been? 3 A. As a general rule, the investigators 4 worked Monday through Friday, 8:00 to 5:00. 5 Q. Okay. 6 A. And so that's where things, you know, 7 obviously, some would be off. And I don't remember 8 how many investigators we had. Maybe 10. 9 Q. Okay. 10 A. But that would just be in their, you know, 11 unless they were on call. 12 Q. So -- so would you have a shift of 13 narcotics investigators all on at the same time or 14 would they work 8:00 to 5:00 and go home? 15 A. Yeah. Narcotics generally worked just 16 kind of when they wanted to because most of the time 17 it would be late at night, early mornings, things 18 such as that. 19 Q. So then it would be necessary for Dedmon 20 to utilize patrol people to help him carry out 21 investigations? 22 A. Yes. 23 Q. Did anybody tell you that the Goon Squad 24 challenge coin was a problem or that you shouldn't 25 have minted it?</p>	<p style="text-align: right;">Page 105</p> <p>1 Q. I'm sorry. The 11 a.m. to 11 p.m. shift. 2 A. That's -- they call that our dayshift but 3 I mean, I see what you mean with that, but. 4 Q. Okay. But the coin was distributed to 5 people outside of your shift? 6 A. Yes. 7 Q. All right. So you kind of had to assume, 8 especially given what you said earlier, that Sheriff 9 Bailey would find out about it because he knew about 10 everything. 11 MR. DARE: Object to form. 12 THE WITNESS: (Inaudible) I gave one to 13 several people like in the office up there so I 14 mean, I don't know. 15 BY MR. WALKER: 16 Q. I may have asked this question earlier. 17 You said you gave it to several people in the 18 office. 19 A. Yes. 20 Q. Do you remember who in the office you gave 21 one to? 22 A. I do. 23 Q. Who? 24 A. I gave one to Michael -- he was there -- 25 he was over the court services. He was a captain.</p>